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Date: April 3, 2001

Initial: C Mkenewar

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Facility Identification Number: OHD 004 294 351

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Note: Transmittal Letter to Be Included with Reports.
Comments:_____

OhioEPA
State of Ohio Environmental Protection Agency

Central District Office

STREET ADDRESS:
32 Alum Creek Drive
Columbus, OH 43207-3417

TELE: (614) 728-3778 FAX: (614) 728-3898

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

September 2, 1998

Re: Decorative Surfaces International, Inc.
Franklin County
RCRA-LQG
OHD004294351

Mr. Grover B. Thomas
Environmental Manager
Decorative Surfaces International, Inc.
1280 North Grant Avenue
Columbus, Ohio 43201

Dear Mr. Thomas:

On August 28, 1998, Ohio EPA received Decorative Surfaces International Inc.'s response to Ohio EPA's August 6, 1998 Notice of Violation. Documentation submitted included a description of the actions taken to ensure that proper shipping names for future shipments of muriatic acid and muriatic rags will be correctly listed, and also copies of the completed RCRA inspection schedule and logs which includes safety and emergency equipment.

A review of this documentation reveals that Decorative Surfaces International, Inc. has adequately demonstrated abatement of all violations discovered during Ohio EPA's June 17, 1998 inspection.

Failure to list specific deficiencies in this communication does not relieve Decorative Surfaces International, Inc. from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve Decorative Surfaces International, Inc. from liability for any past or present violations of the state's hazardous waste laws.

If you should have any questions, please feel free to call me at this office.

Sincerely,

Andrew D. Kubalak
Division of Hazardous Waste Management
Central District Office

ADK/pan
decorr

Enclosures

pc: Michael Beedle, U.S. EPA
Linda Neumann, DHWM, CO
CDO File

State of Ohio Environmental Protection Agency

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P.O. Box 1049
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August 6, 1998

Re: Decorative Surfaces International
Franklin County
RCRA-LQG
OHD004294351

Mr. Grover B. Thomas, III
Environmental Manager
Decorative Surfaces International
1280 North Grant Avenue
Columbus, Ohio 43201

Dear Mr. Thomas:

On June 17, 1998, U.S. EPA and Ohio EPA conducted a compliance evacuation inspection of Decorative Surfaces International's (DSI) Columbus, Ohio facility to determine DSI's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and OAC", respectively). DSI was represented by you and Mr. Michael L. McGroarty. U.S. EPA was represented by Mr. Michael Beedle, and Ohio EPA was represented by me. The inspection included an inspection of facility operations and a review of written documentation.

Additionally, during a tour of the plant, U.S. EPA checked compliance with 265 CFR Part CC. U.S. EPA noted that DSI manages its waste in 55 gallon drums that are closed except when transferring the waste and also that DSI was in compliance with CC regulations.

It was determined during the inspection that DSI violated the following hazardous waste regulations:

1. **Manifest Requirements, OAC rule 3745-52-20**: A generator who transports, or offers for transport, hazardous waste for off-site treatment, storage, or disposal shall prepare a uniform hazardous waste manifest U.S. EPA form 8700-22 before transporting the hazardous waste off-site.

   The waste muriatic acid and waste muriatic acid rags were shipped without using the proper shipping name, see manifest number 00697.

   Please provide this office with a description of the action taken to prevent this violation from recurring.

2. **Testing and Maintenance of Equipment, OAC 3745-65-33(A)(B)**: All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, shall be inspected/tested on a weekly basis and maintained to assure its proper operation in time of emergency. In addition, a test log or summary shall be maintained to record the weekly tests/inspections. These records shall include, at a minimum, the date and time of the test, the name of the person performing the test, observations made and the date and nature of any repairs or remedial actions taken.

Decorative Surfaces International failed to inspect the fire extinguishers on a weekly basis as required by this rule. At the time of the inspection, fire extinguishers were being inspected on a monthly basis. In addition, records of the inspections shall include the information as required by paragraph (B) of this rule. It was noted that all other emergency equipment was being inspected as required by OAC 3745-65-33.

Decorative Surfaces International (DSI) must conduct weekly inspections of the aforementioned equipment and maintain a summary or log of such tests as required by this rule. DSI must submit documentation (two weeks of log records) confirming that it is conducting these inspections weekly to this office for review.

Please submit all of the above requested documentation to this office within thirty (30) days of the date of this letter demonstrating that all violations have been abated. Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at this office.

Failure to list specific deficiencies in this communication does not relieve Decorative Surfaces International (DSI) from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve DSI from liability for any past or present violations of the state's hazardous waste laws.

Sincerely,

Andrew D. Kubalak
Division of Hazardous Waste Management
Central District Office

ADK/pan
decorltr

Enclosures

pc: Michael Beedle, U.S. EPA, w/enclosures
Linda Neumann, DHWM, CO, w/enclosures
CDO File

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Company: Decorative Surfaces International, Inc. EPA I.D.: OHD004294351

Street: 1280 North Grant Avenue City: Columbus

County: Franklin State: Ohio Zip: 43201-2847

Mailing Address: Same (IF DIFFERENT FROM ABOVE)

Telephone: (614) 297-6127 Fax: (614) 297-6079

Owner/ Operator: Same (IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): June 17, 1998 Time(s): 7:45 am - 4:10 pm

Inspection announced? Yes X No ____ If so, how much advance notice given? Five Days

	Name	Affiliation	Telephone
Inspectors:	Michael Beedle, M.S.	U.S. EPA	(312) 353-7922
	Andrew D. Kubalak	Ohio EPA	(614) 728-3887
Facility Rep(s):	Grover B. Thomas, III	Environmental Manager	(614) 297-6097
	Michael L. McGroarty	Environmental Project Coordinator	(614) 297-6159

GENERATOR CLASSIFICATION	WASTE MANAGEMENT ACTIVITY
___ Conditionally Exempt SQG (CESQG)	X Containers
___ Small Quantity Generator (SQG)	___ Tank(s)
X Large Quantity Generator (LQG)	___ Other (specify)
___ No Generation	

CESQG: < 100 Kg (approx. 25-30 gallons) of waste in a calendar month

SQG: between 100 and 1000 Kg (about 25 to under 300 gallons) of waste in a calendar month

LQG: > 1000 Kg (~ 300 gallons) of waste in a calendar month or > 1 Kg of acutely hazardous waste in a calendar month

NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amount in pounds*

REMARKS - GENERAL INFORMATION

Site Activity:

Decorative Surfaces International, Inc. (DSI) is a manufacturer of vinyl films and vinyl wall coverings which are printed and coated using a gravure process with both in-line and U-frame printers, primarily using solvent based inks. The vinyl films are used in many applications such as ready to assemble wood furniture, refrigerator handles and doors, microwave ovens, gypsum board, and automobile trim, etc. The wall coverings are primarily used in commercial applications such as hospitals, hotels, and motels.

DSI begins its manufacturing process with raw resin. The resin is calendered into pliable vinyl in continuous rolls, usually 2 to 10 mils thick. Subsequent processes print, emboss and laminate to a fabric substrate (commercial wall covering only), inspect, and package the material for shipment.

Waste Handling:

DSI utilizes 12 hazardous waste satellite accumulation locations prior to storing hazardous waste on-site for 90 days or less. Photographs were taken during the inspection of the two hazardous waste storage locations.

D005 and D006 (waste oil blend filter bags) is generated in the Calender Premix Department when all the liquid ingredients, including cadmium stabilizers for making vinyl film are weighed, mixed, heated and pumped through a bag filter. The heated oil is sprayed into a blender of dry ingredients where it is mixed and the mixed blend is subsequently fluxed into plastic using a Banbury or Continuous Mixer. The waste stream is manifested to Clean Harbors.

D005 and D006 (waste baghouse filter cartridges and bags) are generated from the dust collectors for the compound blenders, Banbury's and Continuous Mixers when they are changed twice a year during plant shut down. The waste stream is manifested to Clean Harbors.

D001, D007, D008, D035, F003, F005, and K086 (waste solvent ink) is generated in the Print Color Room and in South Mix and consists of waste ink which cannot be recycled. The waste stream is stored at Building No. 95 which is referred to as the bulk storage area or waste ink storage area. The waste stream is stored in 55 gallon containers and is shipped in bulk each 7 to 14 days. This is manifested to Clean Harbors.

D001, D007, D008, D035, F003, and F005 (waste pan wash solids) is generated in the Print Pan Wash Room during cleaning of print pans. The pans are used at the print presses to provide an ink reservoir for the gravure cylinders. The waste consists of ink sludge generated during the pan cleaning operation. This is manifested to Clean Harbors.

D001, D007, D008, D035, F003, F005, and K086 (waste print rags) are generated at the Printing Presses to clean the gravure cylinders and wipe out print pans. This is manifested to Clean Harbors.

D008 (waste drum wash filters) is generated from the water filter used in the Drum Wash Operation. The vacuum filter press operation removes small particulates from the water which would otherwise damage the High Pressure Water Drum Wash System pumps. This is manifested to Clean Harbors.

D001, D007, D008, D035, F003, and F005 (waste drum wash solid/liquids) is generated during the precleaning operation prior to the Drum Wash operation. The empty 55 gallon drums and 27 gallon tubs previously used for in-process ink are mechanically scraped out prior to the drums passing through the High Pressure Water Drum Wash System. This is manifested to Clean Harbors.

D002, D004, and D007 (waste muriatic acid) is generated at Chrome Plating and is waste muriatic acid used to clean copper cylinders before they are re-plated with chrome. This is manifested to Clean Harbors.

D002 and D007 (waste muriatic acid rags) is generated at Chrome Plating when rags are used to wipe muriatic acid off of copper cylinders before they are re-plated with chrome. This is manifested to Clean Harbors.

D007 (waste chromic acid rags) is generated at Chrome Plating when rags are used to wipe chrome off of copper cylinders. This is manifested to Clean Harbors.

D007 (waste spent ink stripper) is generated at Chrome Plating and is waste spent ink stripper used to remove dried ink from chrome gravure cylinders before they are re-plated. The rolls are re-plated when chrome wears off of the gravure cylinder and copper begins showing through or after a gravure cylinder is repaired. This is manifested to Clean Harbors.

F006 (limestone sump liquids) is waste sump water generated at Chrome Plating from the wastewater treatment unit. This is manifested to Clean Harbors.

F006 (limestone sump solids) is waste limestone generated at Chrome Plating from the wastewater treatment unit. This is manifested to Clean Harbors.

Grover Thomas indicated that the <90 day ink storage location will be closed this year or next because the ink storage building is one of 50 buildings at the site which are scheduled to be torn down.

Guidance was provided during the inspection for the management of solvent contaminated rags and wipers, fluorescent lamps and PCB ballasts, and Universal Wastes.

POLLUTION PREVENTION

te to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention practices initiated by companies across the state. Asking the company about each bullet point noted below the questions is not necessary. It is only necessary to ask the company the general questions about pollution prevention activities. If the company responds with one of the canned answers below, the appropriate box may be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any pollution prevention activities to reduce the amount of hazardous waste generated? Yes X No ___ N/A ___ RMK# ___

   (a) ***If so,*** what has the company done to minimize hazardous waste generation?

   [x] A change in the process resulting in less waste
   [ ] A change in the product resulting in less waste
   [x] Use of fewer and less toxic hazardous raw materials
   [x] Better operations/improved housekeeping
   [x] On-site recycling/reuse of hazardous materials
   [x] Sending waste off-site for recycling/reuse
   [x] Other activities (specify) See Remarks Below

   (b) ***If so***, what hazardous wastes have been addressed?

   [x] Solvents
   [ ] Paint related waste
   [ ] Industrial process wastes (sludges, slags, contaminated waste waters, etc.)
   [ ] Contaminated oils/hydraulic fluids
   [ ] Off-spec chemicals
   [x] Fluorescent light bulbs
   [x] Used batteries
   [x] Shop rags
   [x] Other (specify) See Remarks Below

   (c) ***If not***, why hasn't the company considered pollution prevention?

   [ ] The company just never thought about it
   [ ] Lack of information about the alternatives that are practical for them
   [ ] Lack of capital to make process changes
   [ ] Lack of internal management support
   [ ] The company does not generate enough hazardous waste to consider pollution prevention
   [ ] Other reason given (specify)

2. Does the company plan to do pollution prevention activities in the future? Yes X No___ N/A___ RMK#___

3. Would the company be interested in receiving additional information from the Ohio EPA about pollution prevention? Yes X No___ N/A___ RMK#___

REMARKS

Governor George V. Voinovich presented the facility, on September 18, 1996, with an award for Outstanding Achievement in Pollution Prevention.

Pollution Prevention Remarks Cont'd.

Scrap vinyl is no longer landfilled and is now sold to be made into purses, shoes, etc.

Recycling water use from the embossing and calendar departments has resulted in reducing the use of 43M gallons of water per year.

In 1996 a reformulation of coatings resulted in a decrease of 70 tons/year of VOC emissions.

When possible, 27 gallon size containers are used to mix inks rather than 55 gallon.

Fluorescent lamps are stored at the hazardous waste building prior to recycling at Recyclights.

A commitment has been made to not use non-cadmium stabilizers.

Loose fitting dust covers have now been replaced with lids resulting in a reduction of VOC emissions.

Cardboard is recycled by Rumpke.

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A___ RMK#___

3. Were annual reports filed with OEPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? *If so,* — Yes___ No X N/A___ RMK#___

   (a) Generator notified US EPA of export/import activity [3745-52-53] — Yes___ No ☐ N/A X RMK#___

   (b) Generator complied with special manifest requirements [3745-52-54] — Yes___ No ☐ N/A X RMK#___

   (c) For manifests that have not been returned to generator: An exception report has been filed [3745-52-55] — Yes___ No ☐ N/A X RMK#___

   (d) Annual report submitted to US EPA [3745-52-56] — Yes___ No ☐ N/A X RMK#___

   (e) Export related documents being maintained on-site [3745-52-57] — Yes___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since date of last inspection? — Yes___ No X N/A___ RMK# *

   (a) *If so,* describe the unit(s) which the generator has closed:

   (b) Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes___ No ☐ N/A X RMK#___

NOTE: *If the generator has closed a <90 day tank, closure must be completed also in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

   (c) Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standard:

- The bulk ink <90 day storage will be closed prior to the building being torn down. Demolition of the building is scheduled for this year or next.

MANIFEST REQUIREMENTS

1. All hazardous wastes shipped off-site have been accompanied by a manifest (US EPA form 8700-22) [3745-52-20(A)] — Yes X No ☐ N/A___ RMK#___

   (a) Item I and items (1) through (20) of each manifest have been completed [3745-52-20(B)] — Yes___ No X N/A___ RMK#1

NOTE: *US EPA form 8700-22(A) (the continuation form) may be needed in addition to form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]*

2. Manifest designates at least one permitted disposal facility [3745-52-20(C)] — Yes X No ☐ N/A___ RMK#___

NOTE: *The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(D)]*

3. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? — Yes___ No X N/A___ RMK#___

   (a) ***If so,*** did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)] — Yes___ No ☐ N/A X RMK#___

4. Manifests have been signed by the generator and initial transporter [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A___ RMK#___

5. Has the generator received a return copy of each completed manifest within (35) days of being accepted by the transporter? If not, — Yes X No___ N/A___ RMK#___

   (a) Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes___ No ☐ N/A X RMK#___

   (b) If the manifest was not received within (45) days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes___ No ☐ N/A X RMK#___

6. Signed copies of all manifests and any exception reports are being retained for at least 3 years [3745-52-40] — Yes X No ☐ N/A___ RMK#___

REMARKS

#1. The waste muriatic acid and waste muriatic acid rags were shipped without using the proper DOT shipping name, see manifest number 00697. The waste was shipped as organic rather than inorganic.

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-59-07(A)]	Yes X	No ❑	N/A___	RMK#___
(a) **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-59-07(A)(5)]	Yes___	No ❑	N/A X	RMK#___
(b) **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-59-07(A)(5)]	Yes X	No ❑	N/A___	RMK#___
2. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-59-03]	Yes X	No ❑	N/A___	RMK#___
3. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-59-09(A)]	Yes X	No ❑	N/A___	RMK#___
4. Has the generator determined the correct "treatability group(s)" (e.g. wastewater, non-wastewater, etc.)? [3745-59-07(A)]	Yes X	No ❑	N/A___	RMK#___
5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-59-07(A)]	Yes X	No ❑	N/A___	RMK#___
6. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-59-09]	Yes X	No___	N/A___	RMK#___
(a) ***If so,*** has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-59-09(A)]	Yes X	No ❑	N/A___	RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B)]*

7. Does the generator have LDR notification (and certification, where applicable) forms for each shipment of waste? [3745-59-07(A)(1) and (A)(2)]	Yes X	No ❑	N/A___	RMK#___
8. Does each notification/certification form completed contain the following information: [3745-59-07(A)(1) and (A)(2)]				
(a) EPA hazardous waste codes for each waste?	Yes X	No___	N/A___	RMK#___
(b) Appropriate treatment standards for each waste?	Yes X	No___	N/A___	RMK#___
(c) The manifest number?	Yes X	No ❑	N/A___	RMK#___
(d) Waste analysis data, where available?	Yes___	No ❑	N/A X	RMK#___
(e) Certification signed by the generator or an authorized representative? (for wastes meeting treatment standards only)	Yes___	No ❑	N/A X	RMK#___

LDR REQUIREMENTS- cont.

9. Does the generator produce a waste that is hazardous at the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-59-07(A)(6)] Yes___ No_X_ N/A___ RMK#___

   (a) ***If so,*** is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the waste? [3745-59-07(A)(6)] Yes___ No ❑ N/A_X_ RMK#___

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under an NPDES permit, and any characteristic hazardous waste that is rendered nonhazardous via mixing or treatment.*

10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five (5) years? [3745-59-07(A)(7)] Yes_X_ No ❑ N/A___ RMK#___

11. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous? Yes___ No_X_ N/A___ RMK#___

    (a) ***If so,*** are treated waste(s) sent to a licensed solid waste disposal facility? ***If so,*** Yes___ No ❑ N/A_X_ RMK#___

        i. Does the generator submit a notification and certification to the director which contains the following:

            a. Name and address of the facility receiving the waste? [3745-59-09(D)(1)(a)] Yes___ No ❑ N/A_X_ RMK#___

            b. A description of the waste, including EPA hazardous waste numbers and treatability group? [3745-59-09(D)(1)(b)] Yes___ No ❑ N/A_X_ RMK#___

            c. The treatment standards applicable to the waste at the initial point of generation? [3745-59-09(D)(1)(c)] Yes___ No ❑ N/A_X_ RMK#___

        ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a)? [3745-59-09(D)(2)] Yes___ No ❑ N/A_X_ RMK#___

NOTE: *An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10.*

REMARKS

PERSONNEL TRAINING [3745-52-34(A)(4)]

The generator keeps records required by 3745-65-16(D) including:

(a) Job titles, as they relate to hazardous waste management, and the name of each employee filling each job	Yes X	No ❑	N/A___	RMK#___
(b) Job description, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position	Yes X	No ❑	N/A___	RMK#___
(c) Type and amount of both introductory and continuing training to be given to each person filling a position	Yes X	No ❑	N/A___	RMK#___
(d) Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B)&(C)	Yes X	No ❑	N/A___	RMK#___

NOTE: *If the facility's business practices precludes written job titles/ descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be use to document that all necessary employees have been trained.*

2. Generator has a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions [3745-65-16(A)(2)]	Yes X	No ❑	N/A___	RMK#___
3. In accordance with 3745-65-16(A)(3), the personnel training program includes instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with:				
(a) Emergency procedures	Yes X	No ❑	N/A___	RMK#___
(b) Emergency equipment	Yes X	No ❑	N/A___	RMK#___
(c) Emergency systems	Yes X	No ❑	N/A___	RMK#___
4. Does emergency training described in a, b, & c above include, *where applicable*: [3745-65-16(A)(3)(a-f)]				
(a) Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment	Yes X	No ❑	N/A___	RMK#___
(b) Key parameters for automatic waste feed cut-off systems	Yes___	No ❑	N/A X	RMK#___
(c) Communication or alarm systems	Yes X	No ❑	N/A___	RMK#___
(d) Response procedures for fire/explosions	Yes X	No ❑	N/A___	RMK#___
(e) Response to ground water contamination incidents	Yes___	No ❑	N/A X	RMK#___
(f) Shutdown procedures	Yes___	No ❑	N/A X	RMK#___
5. Personnel training program is directed by a person trained in hazardous waste management procedures as required by 3745-65-16(A)(2)	Yes X	No ❑	N/A___	RMK#___

PERSONNEL TRAINING - cont.

6. New employees receive training within 6 months after the date of hire (or assignment to a new position) as required by 3745-65-16(B) Yes X No ❑ N/A___ RMK#___

7. Annual refresher training is provided to employees as required by 3745-65-16(C) Yes X No ❑ N/A___ RMK#___

8. Training records for current personnel are kept until closure of the facility; training records for former employees are kept for at least three years from the date the employee last worked at the facility [3745-65-16(E)] Yes X No ❑ N/A___ RMK#___

9. ***Optional*** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job performed	Name of employee	Date(s) Trained

REMARKS

CONTINGENCY PLAN [3745-52-34(A)(4)]

The facility has a contingency plan which describes the following: [3745-65-52(A) through (F)]

(a) Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste — Yes X No ❑ N/A___ RMK#___

(b) Arrangements/agreements with emergency authorities [3745-65-37] — Yes X No ❑ N/A___ RMK#___

(c) A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator — Yes X No ❑ N/A___ RMK#___

(d) A list of all emergency equipment, including: location, physical description and brief outline of capabilities — Yes X No ❑ N/A___ RMK#___

(e) An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary — Yes X No ❑ N/A___ RMK#___

NOTE: *If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the OAC requirements. [3745-65-52(B)]*

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ❑ N/A___ RMK#___

3. A copy of the plan (plus revisions) is kept on-site and has been given to all emergency authorities that might be required to participate in execution of the plan [3745-65-53(A)(B)] — Yes X No ❑ N/A___ RMK#___

4. The plan is revised in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the director [3745-65-54] — Yes X No ❑ N/A___ RMK#___

EMERGENCY COORDINATOR

5. An emergency coordinator is available at all times (on-site or on-call) [3745-65-55] — Yes X No ❑ N/A___ RMK#___

NOTE: *The Emergency Coordinator shall be thoroughly familiar with: a) all aspects of the facility's contingency plan; b) all operations and activities at the facility c) The location and characteristics of waste handled; d) the location of all records within the facility; e) facility layout; and f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.*

CONTINGENCY PLAN - cont.

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? *If so,* Yes___ No_X_ N/A___ RMK#___

   (a) Was the contingency plan implemented? [3745-65-51(B)] Yes___ No ❑ N/A_X_ RMK#___

   (b) Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes___ No ❑ N/A_X_ RMK#___

   (c) Did the facility submit a report to the director within (15) days of the incident as required by 3745-65-56(J)? Yes___ No ❑ N/A_X_ RMK#___

NOTE: *OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health and the environment.*

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

.. Facility operated to minimize the possibility of fire, explosion, or unplanned release of hazardous waste [3745-65-31]	Yes X	No ☐	N/A___	RMK#___
2. If required due to actual hazards associated with the waste, the facility has the following equipment: [3745-65-32(A)(B)(C)(D)]				
(a) Internal alarm system	Yes X	No ☐	N/A___	RMK#___
(b) Emergency communication device	Yes X	No ☐	N/A___	RMK#___
(c) Portable fire control, spill control and decon equipment	Yes X	No ☐	N/A___	RMK#___
(d) Water of adequate volume/pressure	Yes X	No ☐	N/A___	RMK#___
3. Emergency equipment tested (inspected) on a weekly basis and maintained as necessary [3745-65-33]	Yes___	No X	N/A___	RMK# 2
4. Emergency equipment tests (inspections) are recorded in a log that includes the following information [3745-65-33(B)]				
(a) Date and time of test	Yes___	No X	N/A___	RMK# 2
(b) Name of person conducting the test	Yes___	No X	N/A___	RMK# 2
(c) Observations made	Yes___	No X	N/A___	RMK# 2
(d) Date/nature of any repairs	Yes___	No X	N/A___	RMK# 2
5. Personnel have immediate access to a communication device when handling hazardous waste *(unless the device is not required under 3745-65-32)* [3745-65-34]	Yes X	No ☐	N/A___	RMK#___
6. Adequate aisle space is provided for unobstructed movement of emergency or spill control equipment [3745-65-35]	Yes X	No ☐	N/A___	RMK#___
7. Facility has attempted to familiarize emergency authorities with possible hazards and facility layout [3745-65-37(A)]	Yes X	No ☐	N/A___	RMK#___
(a) Where authorities have declined to enter into arrangements/ agreements, the refusal has been documented [3745-65-37(B)]	Yes___	No ☐	N/A X	RMK#___

REMARKS

#2. Decorative Surfaces International, Inc. failed to inspect fire extinguishers on a weekly basis, as required by this rule. At the time of the inspection, fire extinguishers were being inspected on a monthly basis. In addition, records of the inspections shall include the information as required by paragraph (B) of this rule. It was noted that all other emergency equipment was being inspected as required by OAC 3745-65-33(A)(B).

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of (90) days without a permit or an extension from the director? [3745-52-34; ORC 3734.02(E)(F)] — Yes ❑ No X N/A___ RMK#___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Satellite accumulation areas are:

   (a) At or near a point of generation — Yes X No ❑ N/A___ RMK#___
   (b) Under the control of the operator of the process generating the waste — Yes X No ❑ N/A___ RMK#___
   (c) Total quantities of all waste streams do not exceed 55 gallons — Yes X No ❑ N/A___ RMK#___
   (d) Quantities of acutely hazardous waste do not exceed 1 quart at any one time — Yes X No ❑ N/A___ RMK#___
   (e) Containers are marked with words "Hazardous Waste" **or** other words identifying the contents — Yes X No ❑ N/A___ RMK#___

NOTE: *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to the Ohio EPA November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? ***If so,*** — Yes X No___ N/A___ RMK#___

   (a) Did the generator comply with 3745-52-34(A) or other applicable generator requirements within (3) days? **and;** — Yes X No ❑ N/A___ RMK#___

   (b) Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (1 quart) limit was exceeded? — Yes X No ❑ N/A___ RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Containers are marked with the words "Hazardous Waste" [3745-52-34(A)(3)] — Yes X No ❑ N/A___ RMK#___

5. Accumulation date is on each container [3745-52-34(A)(2)] — Yes X No ❑ N/A___ RMK#___

6. Are hazardous wastes stored in containers which are:

   (a) Closed (except when adding/removing wastes) [3745-66-73(A)] — Yes X No ❑ N/A___ RMK#___
   (b) In good condition [3745-66-71] — Yes X No ❑ N/A___ RMK#___
   (c) Compatible with wastes stored in them [3745-66-72] — Yes X No ❑ N/A___ RMK#___
   (d) Handled in a manner which prevents rupture/leakage [3745-66-73(B)] — Yes X No ❑ N/A___ RMK#___

7. Is the container accumulation area(s) inspected weekly [3745-66-74] *(Note location in General Information section of checklist)* — Yes X No ❑ N/A___ RMK#___

8. Are inspections described in Question #7 recorded in a log which contains the following information: [3745-66-74(B)]

(a)	Date and time of inspection	Yes X	No ❑	N/A___	RMK#___
(b)	Name of inspector	Yes X	No ❑	N/A___	RMK#___
(c)	Observations made during the inspection	Yes X	No ❑	N/A___	RMK#___
(d)	Date/nature of any repairs or remedial action	Yes X	No ❑	N/A___	RMK#___

9. For ignitable and/or reactive hazardous waste(s):

(a)	Containers are located at least 50 feet (15 meters) from the facility's property line [3745-66-76]	Yes X	No ❑	N/A___	RMK#___
(b)	Containers are stored separately from other materials which may interact with the waste in a hazardous manner [3745-66-77(C)]	Yes X	No ❑	N/A___	RMK#___

PRE-TRANSPORT REQUIREMENTS

10.	Waste is packaged/labeled in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]	Yes X	No ❑	N/A___	RMK#___
11.	Each container < 110 gallons has a completed hazardous waste label [3745-52-32(B)]	Yes X	No ❑	N/A___	RMK#___
12.	Before off-site transportation, generator placards **or** offers the appropriate DOT placards to the initial transporter [3745-52-33]	Yes X	No ❑	N/A___	RMK#___

REMARKS

Hazardous waste is stored for <90 days at either the previously permitted storage building numbered 37/59 and at the Bulk Ink storage area.

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

Emergency Contact Telephone Number

Form Approved. OMB No. 2050-0039. Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
O H D 0 0 4 2 9 4 3 5 1	0 9 6 9 6		

3. Generator's Name and Mailing Address
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614) 297-6097

A. State Manifest Document Number

B. State Generator's ID
PO BOX 208 1280 N GRANT AVE
COLUMBUS, OH 43216

5. Transporter 1 Company Name: Clean Harbors Env. Services, Inc
6. US EPA ID Number: M A D 0 3 9 3 2 2 2 5 0
C. State Transporter's ID
D. Transporter's Phone: 781 849-1800

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232
10. US EPA ID Number: O H D 0 0 0 8 1 6 6 2 9
G. State Facility's ID
H. Facility's Phone: 513 681-5738

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S., (TOLUENE & METHYL ETHYL KETONE)(D001, D007, D008, K086, F003, F005,) 3, UN1993, II	X	001	TT	4500	G	F003 F005 K086
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
11a U64724 D001, D007, D008, D035

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D6109696
IN EMERGENCY, CALL CHES 1-800-645-8265
ERG 128
359

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Daniel J. Schaaf	Daniel J. Schaaf	04	28	98

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Ross Mollohan	Ross Mollohan	04	28	98

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Michael Spillane	Michael Spillane	04	28	98

Clean Harbors has appropriate permits for & will accept the waste the generator is shipping.

DRIVER TICKET

CleanHarbors

ENVIRONMENTAL SERVICES, INC.
CENTRAL DISPATCH
24 HOUR SERVICE
1-800-635-2767
FAX 1-617-848-2141

DRIVER NAME: Ross Molohan

DATE: 4/28/98 TO#: _____ CWO# D6109696

TRACTOR # 1170 TRAILER # 359 CAN # _____

GENERATOR/TSDF Columbus Coated Fabrics

Columbus, OH

****

MANIFEST NO'S: 09696

****

LOADING / UNLOADING

ARRIVED 8:00 Am DEPARTED 11:15 Am TOTAL HRS. 3 1/4

COMMENTS _____

SIGNATURE VERIFIES
ARRIVAL & DEPARTURE TIMES

DATE 4/28/98

CHI 136A

WHITE - CLEAN HARBORS PINK - CUSTOMER/TSDF YELLOW - DRIVER

Please print or type.
(Form designed for use on elite (12-pitch) typewriter)

Emergency Contact Telephone Number

Form Approved. OMB No. 2050-0039. Expires 9-30-98

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: O.H.D.0.0.4.2.9.4.3.5.1
Manifest Document No.: 0.7.6.9.6
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614) 297-6097

A. State Manifest Document Number

B. State Generator's ID
PO BOX 268 1280 N GRANT AVE
COLUMBUS, OH 43216

5. Transporter 1 Company Name
Clean Harbors Env. Services, Inc

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 781 849-1800

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232

10. US EPA ID Number
O H D 0 0 0 8 1 6 6 2 9

G. State Facility's ID

H. Facility's Phone 513 681-5738

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, WASTE FLAMMABLE LIQUIDS, N.O.S., (TOLUENE & METHYL ETHYL KETONE) (D001, D007, D008, K086, F003, F005,) 3, UN1993, II	X	001	TT	4500	G	F003 F005 K086
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
11a U64724 D001, D007, D008, D035

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D6109696
IN EMERGENCY, CALL CHES 1-800-645-8265
359

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR,** if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Daniel J. Schaaf
Signature:
Month 04 Day 28 Year 98

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ross Mallahan
Signature:
Month 04 Day 28 Year 98

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

J. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name:
Signature:
Month . Day . Year .

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete. late permit for X will accept the waste the generator is shipping.

GENERATOR'S COPY

7-BLC-M5 (Rev. 10/96)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: OHD004294351
Manifest Document No.: 00687

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614) 297-6097

A. State Manifest Document Number

B. State Generator's ID: PO Box 288 1280 N Grant Ave
Columbus, OH 43216

5. Transporter 1 Company Name: Clean Harbors Env.Services,Inc

6. US EPA ID Number: MAD039322250

C. State Transporter's ID: 619018 ME

D. Transporter's Phone: 781 849-1800

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address:
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232

10. US EPA ID Number: OHD000816629

G. State Facility's ID

H. Facility's Phone: 513 681-5738

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ,WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE & TOLUENE)(D001,D007,D008), 3, UN1993, II	001	DM	00055	G	F003 F005 K086
b.	X	RQ,HAZARDOUS WASTE LIQUID, N.O.S. (CHROMIUM), 9, NA3082, III	001	DM	00055	G	D007
c.		RQ, HAZARDOUS WASTE LIQUID,N.O.S.(BARIUM,CADMIUM) (D006), 9, NA3082, PGIII	005	DM	00275	G	D005 D006
d.		NON-HAZARDOUS, NON-D.O.T. Regulated MATERIAL None	011	DM	00605	G	NONE

J. Additional Descriptions for Materials Listed Above
11a U64528 D001,D007,D008,D035
11b U40445
11c CH066460
11d CH100477

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D696938
IN EMERGENCY, CALL CHES 1-800-645-8265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: GROVER THOMAS | Signature: Grover Thomas | Month Day Year: 10 21 1998

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Jeff Curry | Signature: Jeff Curry | Month Day Year: 10 21 1998

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: MARIANNE FRELAND | Signature: Marianne Freland | Month Day Year: 10 21 1998

Clean Harbors has appropriate permits for & will accept the waste the generator is shipping.

ORIGINAL-RETURN TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.: O H D 0 0 4 2 9 4 3 5 1

2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614) 297-6097

A. State Manifest Document Number

B. State Generator's ID: PO Box 208 1280 N Grant Ave Columbus, OH 43216

5. Transporter 1 Company Name: Clean Harbors Env. Services, Inc

6. US EPA ID Number: M A D 0 3 9 3 2 2 2 5 6

C. State Transporter's ID: CHARLS AVE

D. Transporter's Phone: 781 849-1800

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232

10. US EPA ID Number: O H D 0 0 0 8 1 6 6 2 9

G. State Facility's ID

H. Facility's Phone: 513 681-5738

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE & TOLUENE)(D001, D007, D008), 3, UN1993, II	X	001	DM	00055	G	F003 F005 K086
b. RQ, HAZARDOUS WASTE LIQUID, N.O.S. (CHROMIUM), 9, NA3082, III	X	001	DM	00055	G	D007
c. RQ, HAZARDOUS WASTE LIQUID,N.O.S.(BARIUM,CADMIUM) (D006), 9, NA3082, PGIII		005	DM	00275	G	D005 D006
d. NON-HAZARDOUS, NON-DOT Regulated Material None		011	DM	00605	G	NONE

J. Additional Descriptions for Materials Listed Above
11a U64528 D001, D007, D008, D035
11b U40445
11c CH066460
11d CH066477

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D696938
IN EMERGENCY, CALL CHES 1-800-645-8265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
		10	11	08

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
		10	11	08

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year

Clean Harbors has appropriate permits for & will accept the waste the generator is shipping.

Style 6-17 LABELMASTER, AN AMERICAN LABEL MARK CO., CHICAGO, IL 60646 (800) 621-5808

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

PRINTED ON RECYCLED PAPER USING SOYBEAN INK

PRINTED WITH SOY INK

GENERATOR COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614) 297-6697

A. State Manifest Document Number

B. State Generator's ID PO Box 208 1280 N Grant Ave Columbus, OH 43216

5. Transporter 1 Company Name: Clean Harbors Env Services Inc

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone 781 849-1800

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232

10. US EPA ID Number: O H D 0 0 0 8 1 6 6 2 9

G. State Facility's ID

H. Facility's Phone 513 681-5738

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE & TOLUENE)(D001, D007, D008), 3, UN1993, II	X					F003 F005 K086
b. RQ, HAZARDOUS WASTE LIQUID, N.O.S. (CHROMIUM), 9, NA3082, III	X					D007
c. RQ, HAZARDOUS WASTE LIQUID, N.O.S. (BARIUM, CADMIUM) (D005), 9, NA3082, PGIII						D005 D006
d. Non-Hazardous, Non DOT Regulated Material						None

J. Additional Descriptions for Materials Listed Above
11a U64528 D001, D007, D008, D035
11b U40445
11c CH066460

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D696938
IN EMERGENCY, CALL CHES 1-800-645-8265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year

Clean Harbors has appropriate permits for & will accept the waste the generator is shipping.

FILE COPY OR STATE COPY

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 Manifest No. 006887

THE HAZARDOUS WASTES IDENTIFIED ON THE HAZARDOUS WASTE MANIFEST IDENTIFIED ABOVE AND BEARING THE EPA HAZARDOUS WASTE CODES LISTED BELOW ARE RESTRICTED WASTES WHICH ARE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT UNDER THE LAND DISPOSAL RESTRICTIONS, 40 CFR PART 268 AND RCRA SECTION 3004(D). IN ACCORDANCE WITH 40 CFR 268.7(A)(1), THE EPA WASTE CODE, WASTE SUBCATEGORY, AND TREATABILITY GROUPS, AS APPLICABLE, ARE INCLUDED BELOW.

INSTRUCTIONS -- COMPLETE ALL SECTIONS. REFER TO PAGE 3 OF THIS FORM FOR KEY TERMS/DEFINITIONS.
Column 1 - Line Item: Enter the manifest line item number (e.g., 11a) that corresponds to the waste code(s).
Column 2 - Waste Codes/Subcategory: Check off all applicable waste codes. For D001 through D043, also check applicable subcategory; for F001 through F005, check applicable constituents.
Column 3 - Wastewater/Non-wastewater: Check off "WW" for wastewater and "Non-WW" for non-wastewaters.
Column 4 - LDR Handling Code: Circle the appropriate handling code, as follows:

1 = The waste is a characteristic hazardous waste D001, D002, D003, or D018-43 which is intended for treatment/disposal in a CWA system, CWA-equivalent system, or Class I SDWA system. Underlying Hazardous Constituents (UHC's) are NOT required to be identified.

1A = The waste is a characteristic hazardous waste D001 High TOC Ignitable Liquids Subcategory (i.e., greater than or equal to 10% TOC). Pursuant to 40 CFR 268.40, the waste must be treated using organic recovery (RORGS) or combustion (CMBST) technology. UHC's are NOT required to be identified.

2 = The waste is a characteristic hazardous waste D001 (other than High TOC Ignitable Liquids), D002, D003 Explosive, Water Reactive or Other Reactive subcategory, D012-17 non-wastewater, or D018-43 which is intended for treatment/disposal in a non-CWA system, non-CWA-equivalent system, or non-Class I SDWA system located in the United States. All UHC's which are reasonably expected to be present must be identified, except for D001 waste that is intended to be treated using organic recovery (RORGS) or combustion (CMBST) technologies. Identify UHC's by completing Sections I and IV of CHI Form LDR-1 Addendum and attach completed Addendum to this form.

3 = The waste is a characteristic (i.e., D-code) or listed (i.e., F-, K-, U-, or P-code) hazardous waste which is intended for export and treatment/disposal at a facility located outside the United States. LDR treatment standards do not apply to hazardous waste treated/disposed in a foreign country, and per USEPA guidance, the identification of UHC's (if applicable) is not required for hazardous waste that is intended to be exported. Note however that if the exported waste is subsequently returned for treatment/disposal in the United States, all applicable LDR regulations would apply and a revised LDR notification would be required.

4 = The waste meets the definition of hazardous debris pursuant to 40 CFR 268.2(h) and is intended for treatment/disposal in compliance with the alternate debris treatment technologies of 40 CFR 268.45. In accordance with the requirements of 40 CFR 268.7(a)(1)(iv)(A): (1) "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45"; and (2) the contaminants subject to treatment (CSTT's) must be identified as part of this notification. Identify CSTT's by completing Sections III and IV of CHI Form LDR-1 Addendum and attach completed Addendum to this form.

5 = The waste is a characteristic waste D003 Reactive Sulfide, Reactive Cyanide, or Unexploded Ordnance subcategory, a characteristic waste D004-11, a characteristic waste D012-17 wastewater, or a listed (i.e., F-, K-, U-, or P-code) hazardous waste. UHC's are NOT required to be identified.

6 = The waste is a lab pack that is intended for incineration using the alternative lab pack treatment standard under 40 CFR 268.42(c). UHC's are NOT required to be identified; however, the generator must complete and attach the lab pack certification statement on CHI Form LDR-LP. Note that in accordance with 40 CFR Part 268 Appendix IV, lab packs which contain waste codes D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P076, P078, U134, and U151 are not eligible for alternative lab pack treatment standard.

SECTION I. CHARACTERISTIC WASTES D001 THROUGH D043

COLUMN 1: LINE ITEM SEE MANIFEST		COLUMN 2: WASTE CODE / SUBCATEGORY		COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
	[ ] D001	Ignitables, except High TOC subcategory		[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D001	High TOC Ignitable Liquids Subcategory (Greater than or equal to 10% TOC)		[ ] Non-WW only	1A 3 6
	[ ] D002	Corrosives		[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D003				
		[ ]	Reactive Sulfide, per 261.23(a)(5)	[ ] WW [ ] Non-WW	1 3 4 5 6
		[ ]	Reactive Cyanide, per 261.23(a)(5)	[ ] WW [ ] Non-WW	1 3 4 5 6
		[ ]	Explosive, per 261.23(a)(6), (7) & (8)	[ ] WW [ ] Non-WW	1 2 3 4 6
		[ ]	Water Reactive, per 261.23(a)(2), (3) & (4)	[ ] Non-WW only	1 2 3 4 6
		[ ]	Other Reactive, per 261.23(a)(1)	[ ] WW [ ] Non-WW	1 2 3 4 6
		[ ]	Unexploded Ordnance, Emergency Response	[ ] WW [ ] Non-WW	1 3 4 5 6
	[ ] D004	Arsenic		[ ] WW [ ] Non-WW	3 4 5 6
11c	[X] D005	Barium		[ ] WW [X] Non-WW	3 4 (5) 6
11c	[X] D006				
		[X]	Cadmium	[ ] WW [X] Non-WW	3 4 (5) 6
		[ ]	Cadmium Containing Batteries	[ ] Non-WW only	3 5 6
11b	[X] D007	Chromium		[ ] WW [X] Non-WW	3 4 (5) 6
	[ ] D008				
		[ ]	Lead	[ ] WW [ ] Non-WW	3 4 5 6
		[ ]	Lead Acid Batteries	[ ] Non-WW only	3 5 6

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1

Manifest No. 006857

SECTION I. CHARACTERISTIC WASTES D001-43 (CONTINUED)

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / NAME	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
	[ ] D009		
	[ ] Low Mercury, less than 260 mg/kg Mercury	[ ] WW [ ] Non-WW	3 4 5
	[ ] High Mercury Organic Subcategory	[ ] Non-WW only	3 4 5
	[ ] High Mercury Inorganic Subcategory	[ ] Non-WW only	3 4 5
	[ ] D010 Selenium	[ ] WW [ ] Non-WW	3 4 5 6
	[ ] D011 Silver	[ ] WW [ ] Non-WW	3 4 5 6
	[ ] D012 Endrin	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D013 Lindane	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D014 Methoxychlor	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D015 Toxaphene	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D016 2,4-D	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D017 2,4,5-TP (Silvex)	[ ] WW [ ] Non-WW	2 3 4 5 6
	[ ] D018 Benzene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D019 Carbon tetrachloride	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D020 Chlordane	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D021 Chlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D022 Chloroform	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D023 o-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D024 m-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D025 p-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D026 Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D027 1,4-Dichlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D028 1,2-Dichloroethane	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D029 1,1-Dichloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D030 2,4-Dinitrotoluene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D031 Heptachlor (and its epoxide)	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D032 Hexachlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D033 Hexachlorobutadiene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D034 Hexachloroethane	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D035 Methyl ethyl ketone	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D036 Nitrobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D037 Pentachlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D038 Pyridine	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D039 Tetrachloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D040 Trichloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D041 2,4,5-Trichlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D042 2,4,6-Trichlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ] D043 Vinyl Chloride	[ ] WW [ ] Non-WW	1 2 3 4 6

SECTION II. SPENT SOLVENT WASTES F001 THROUGH F005

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / CONSTITUENTS	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
11a	[ ] F001 [ ] F002 [X] F003 [ ] F004 [X] F005	[ ] WW [X] Non-WW	3 4 (5) 6

- [ ] 1. ALL F001-F005
- [ ] 2. Acetone
- [ ] 3. Benzene
- [ ] 4. n-Butyl alcohol
- [ ] 5. Carbon disulfide
- [ ] 6. Carbon tetrachloride
- [ ] 7. Chlorobenzene
- [ ] 8. o-Cresol
- [ ] 9. m-Cresol (difficult to distinguish from p-cresol)
- [ ] 10. p-Cresol (difficult to distinguish from m-cresol)
- [ ] 11. Cresol - mixed isomers (sum of o-, m- and p-cresol)
- [ ] 12. Cyclohexanone
- [ ] 13. o-Dichlorobenzene
- [ ] 14. 2-Ethoxyethanol (F005 only)
- [ ] 15. Ethyl acetate
- [ ] 16. Ethyl benzene
- [ ] 17. Ethyl ether
- [ ] 18. Isobutyl alcohol
- [ ] 19. Methanol
- [ ] 20. Methylene chloride
- 11a [X] 21. Methyl ethyl ketone
- 11a [X] 22. Methyl isobutyl ketone
- [ ] 23. Nitrobenzene
- [ ] 24. 2-Nitropropane (F005 only)
- [ ] 25. Pyridine
- [ ] 26. Tetrachloroethylene
- 11a [X] 27. Toluene
- [ ] 28. 1,1,1-Trichloroethane
- [ ] 29. 1,1,2-Trichloroethane
- [ ] 30. Trichloroethylene
- [ ] 31. 1,1,2-Trichloro-1,2,2-trifluoroethane
- [ ] 32. Trichloromonofluoromethane
- [ ] 33. Xylene - mixed isomers (sum of o-, m-, and p-xylene)

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1

Manifest No. 006897

SECTION III. CALIFORNIA LIST WASTES

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / SUBCATEGORY	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
_____	Hazardous waste containing one or more of the following California List constituents: [ ] ALL CALIFORNIA LIST CONSTITUENTS [ ] Liquids with nickel greater than or equal to 134 mg/l [ ] Liquids with thallium greater than or equal to 130 mg/l [ ] Liquids with PCB's > or = 50 ppm [ ] Waste containing HOC's > or = 1,000 mg/kg	[ ] WW [ ] Non-WW	1 2 3 4 5 6

SECTION IV. OTHER LISTED WASTES (F006-12, F019-F028, F037-38, F039, K-, U-, AND P-CODES)

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / SUBCATEGORY	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
11a	K086	[ ] WW [X] Non-WW	3 4 (5) 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6

[ ] CHECK HERE IF ADDITIONAL LISTED WASTE CODES ARE PRESENT. COMPLETE AND ATTACH LDR-1 CONTINUATION SHEET.
[ ] CHECK HERE IF WASTE CODE F039 (MULTISOURCE LEACHATE) IS PRESENT. IDENTIFY F039 CONSTITUENTS BY COMPLETING SECTIONS II AND IV OF CHI FORM LDR-1 ADDENDUM AND ATTACH COMPLETED ADDENDUM TO THIS FORM.

SECTION V. CONTACT NAME AND DATE

Print Name: Carter Thomas Date: 2-11-98

KEY TERMS/DEFINITIONS

CLASS I SDWA SYSTEM means a Class I deep well facility regulated under the Safe Drinking Water Act (SDWA).

CWA SYSTEM means a centralized wastewater treatment facility discharging under a Clean Water Act (CWA) permit. For example, a CWA facility would treat organic or inorganic aqueous wastes and discharge the treated effluent to the local sewer system. Examples of CWA treatment systems owned and operated by Clean Harbors include the wastewater treatment operations at Baltimore (including the CES system), Bristol, Chicago, Cincinnati and Cleveland.

CWA-EQUIVALENT SYSTEM means a "zero discharge system" that engages in "CWA-equivalent" treatment before land disposal. Zero-discharge facilities treat hazardous wastes using "CWA-equivalent" treatment methods, but do not discharge the treatment effluent to a sewer or water body (e.g., spray irrigation land farm). "CWA-equivalent" treatment methods means biological treatment for organics, alkaline chlorination, or ferrous sulfate precipitation for cyanide, precipitation/ sedimentation for metals, reduction of hexavalent chromium, or other treatment technology that can be demonstrated to perform equally or greater than these technologies.

HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY means an ignitable liquid hazardous waste (waste code D001) which contains greater than or equal to 10% total organic carbon (TOC). Pursuant to 40 CFR 268.40, such wastes must be treated using organic recovery (RORGS) or combustion (CMBST) technology. Examples of RORGS technologies include the CES unit at Clean Harbors of Baltimore. Examples of CMBST technologies include hazardous waste fuel blending and subsequent reuse at a cement kiln, or destruction at a RCRA incinerator.

WASTEWATERS are wastes that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS). [See 40 CFR 268.2(f)]

LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 ADDENDUM Manifest No. 000687

SECTION I. UNDERLYING HAZARDOUS CONSTITUENTS (UHC'S)

[ ] Check here if one or more of the constituents listed in Section IV below are reasonably expected to be present as an "Underlying Hazardous Constituent" in the waste. Then in Section IV, check off each constituent. Note that per the definition of UHC in 40 CFR 268.2, vanadium and zinc are NOT regulated as UHC's.

[ ] Check here if NONE of the UHC constituents listed in Section IV are expected to be present in the waste.

SECTION II. MULTI-SOURCE LEACHATE (WASTE CODE F039)

[ ] Check here if one or more of the constituents listed in Section IV are present as a constituent in the multi-source leachate (F039) waste. Then in Section IV below, check off each constituent. Note that constituents which are identified by an asterisk (*) are NOT regulated as F039 constituents.

[ ] Check here if NONE of the F039 constituents listed in Section IV are present in the waste.

SECTION III. HAZARDOUS DEBRIS CONTAMINANTS SUBJECT TO TREATMENT (CSTT)

[ ] Check here if one or more of the constituents listed in Section IV is a CSTT for hazardous debris that is intended for treatment using the alternate treatment technologies in 40 CFR 268.45. To identify CSTT's, refer to the "Regulated Hazardous Constituent" column in the Treatment Standard Table in 40 CFR 268.40. Then, in Section IV below, check off the constituents that appear for each waste code used to identify the debris.

[ ] Check here if the entry in the "Regulated Hazardous Constituent" column in the Treatment Standard Table in 40 CFR 268.40 is "Not Applicable" , i.e. D001, D002, and D003 (non-cyanides subcategories only).

SECTION IV. LIST OF CONSTITUENTS - INCLUDE MANIFEST LINE ITEM

250. _____ [ ] A2213 (*)
34. _____ [ ] Acenaphthylene
35. _____ [ ] Acenaphthene
36. _____ [ ] Acetone
37. _____ [ ] Acetonitrile
38. _____ [ ] Acetophenone
39. _____ [ ] 2-Acetylaminofluorene
40. _____ [ ] Acrolein
41. _____ [ ] Acrylamide (*)
42. _____ [ ] Acrylonitrile
251. _____ [ ] Aldicarb sulfone (*)
43. _____ [ ] Aldrin
44. _____ [ ] 4-Aminobiphenyl
45. _____ [ ] Aniline
46. _____ [ ] Anthracene
47. _____ [ ] Antimony
48. _____ [ ] Aramite
49. _____ [ ] Arsenic
50. _____ [ ] alpha-BHC
51. _____ [ ] beta-BHC
52. _____ [ ] delta-BHC
53. _____ [ ] gamma-BHC
252. _____ [ ] Barban (*)
54. _____ [ ] Barium
253. _____ [ ] Bendiocarb (*)
254. _____ [ ] Bendiocarb phenol (*)
255. _____ [ ] Benomyl (*)
55. _____ [ ] Benzene
56. _____ [ ] Benz(a)anthracene
57. _____ [ ] Benzal chloride (*)
58. _____ [ ] Benzo(b)fluoranthene (difficult to distinguish from Benzo(k)fluoranthene)
59. _____ [ ] Benzo(k)fluoranthene (difficult to distinguish from Benzo(b)fluoranthene)
60. _____ [ ] Benzo(g,h,i)perylene
61. _____ [ ] Benzo(a)pyrene
62. _____ [ ] Berylium
63. _____ [ ] Bromodichloromethane
64. _____ [ ] Bromomethane (Methyl bromide)
65. _____ [ ] 4-Bromophenyl phenyl ether
66. _____ [ ] n-Butyl alcohol
256. _____ [ ] Butylate (*)
67. _____ [ ] Butyl benzyl phthalate
68. _____ [ ] 2-sec-Butyl-4,6-dinitrophenol (Dinoseb)
69. _____ [ ] Cadmium
257. _____ [ ] Carbaryl (*)
258. _____ [ ] Carbendazim (*)
259. _____ [ ] Carbofuran (*)
260. _____ [ ] Carbofuran phenol (*)
70. _____ [ ] Carbon disulfide
71. _____ [ ] Carbon tetrachloride
261. _____ [ ] Carbosulfan (*)
72. _____ [ ] Chlordane (alpha and gamma isomers)
73. _____ [ ] p-Chloroaniline
74. _____ [ ] Chlorobenzene
75. _____ [ ] Chlorobenzilate
76. _____ [ ] 2-Chloro-1,3-butadiene
77. _____ [ ] Chlorodibromomethane
78. _____ [ ] Chloroethane
79. _____ [ ] bis(2-Chloroethoxy)methane
80. _____ [ ] bis(2-Chloroethyl)ether
81. _____ [ ] Chloroform
82. _____ [ ] bis(2-Chloroisopropyl)ether
83. _____ [ ] p-Chloro-m-cresol
84. _____ [ ] 2-Chloroethyl vinyl ether (*)
85. _____ [ ] Chloromethane (Methyl Chloride)
86. _____ [ ] 2-Chloronaphthalene
87. _____ [ ] 2-Chlorophenol
88. _____ [ ] 3-Chloropropylene
89. _____ [ ] Chromium (Total)
90. _____ [ ] Chrysene
91. _____ [ ] o-Cresol
92. _____ [ ] m-Cresol (difficult to distinguish from p-Cresol)
93. _____ [ ] p-Cresol (difficult to distinguish from o-Cresol)
262. _____ [ ] m-Cumenyl methylcarbamate (*)
94. _____ [ ] Cyanides (Total)
95. _____ [ ] Cyanides (Amenable)
263. _____ [ ] Cycloate (*)
96. _____ [ ] Cyclohexanone
97. _____ [ ] 1,2-Dibromo-3-chloropropane
98. _____ [ ] 1,2-Dibromoethane (Ethylene dibromide)
99. _____ [ ] Dibromomethane
100. _____ [ ] 2,4-Dichlorophenoxyacetic acid (2,4-D)
101. _____ [ ] o,p'-DDD
102. _____ [ ] p,p'-DDD
103. _____ [ ] o,p'-DDE
104. _____ [ ] p,p'-DDE
105. _____ [ ] o,p'-DDT
106. _____ [ ] p,p'-DDT
107. _____ [ ] Dibenz(a,h)anthracene
108. _____ [ ] Dibenzo(a,e)pyrene
109. _____ [ ] m-Dichlorobenzene
110. _____ [ ] o-Dichlorobenzene
111. _____ [ ] p-Dichlorobenzene
112. _____ [ ] Dichlorodifluoromethane
113. _____ [ ] 1,1-Dichloroethane
114. _____ [ ] 1,2-Dichloroethane
115. _____ [ ] 1,1-Dichloroethylene
116. _____ [ ] trans-1,2-Dichloroethylene
117. _____ [ ] 2,4-Dichlorophenol
118. _____ [ ] 2,6-Dichlorophenol
119. _____ [ ] 1,2-Dichloropropane
120. _____ [ ] cis-1,3-Dichloropropylene
121. _____ [ ] trans-1,3-Dichloropropylene

Manifest No. 00808 1

122. _____ [ ] Dieldrin
123. _____ [ ] Diethyl phthalate
264. _____ [ ] Diethylene glycol, dicarbamate (*)
124. _____ [ ] 2,4-Dimethyl phenol
125. _____ [ ] Dimethyl phthalate
126. _____ [ ] Di-n-butyl phthalate
127. _____ [ ] 1,4-Dinitrobenzene
128. _____ [ ] 4,6-Dinitro-o-cresol
129. _____ [ ] 2,4-Dinitrophenol
130. _____ [ ] 2,4-Dinitrotoluene
131. _____ [ ] 2,6-Dinitrotoluene
132. _____ [ ] Di-n-octyl phthalate
265. _____ [ ] Dimetilan (*)
133. _____ [ ] p-Dimethylaminoazobenzene (*)
134. _____ [ ] Di-n-propylnitrosoamine
135. _____ [ ] 1,4-Dioxane (*)
136. _____ [ ] Diphenylamine (difficult to distinguish from diphenylnitrosamine)
137. _____ [ ] Diphenylnitrosamine (difficult to distinguish from diphenylamine)
138. _____ [ ] 1,2-Diphenylhydrazine
139. _____ [ ] Disulfoton
266. _____ [ ] Dithiocarbamates (Total) (*)
140. _____ [ ] Endosulfan I
141. _____ [ ] Endosulfan II
142. _____ [ ] Endosulfan sulfate
143. _____ [ ] Endrin
144. _____ [ ] Endrin aldehyde
267. _____ [ ] EPTC (*)
145. _____ [ ] Ethyl acetate
146. _____ [ ] Ethyl cyanide (propanenitrile)
147. _____ [ ] Ethyl benzene
148. _____ [ ] Ethyl ether
149. _____ [ ] bis(2-Ethylhexyl)phthalate
150. _____ [ ] Ethyl methacrylate
151. _____ [ ] Ethylene oxide
152. _____ [ ] Famphur
153. _____ [ ] Fluoranthene
154. _____ [ ] Fluorene
155. _____ [ ] Fluoride
268. _____ [ ] Formetanate hydrochloride (*)
269. _____ [ ] Formparanate (*)
156. _____ [ ] Heptachlor
157. _____ [ ] Heptachlor epoxide
158. _____ [ ] Hexachlorobenzene
159. _____ [ ] Hexachlorobutadiene
160. _____ [ ] Hexachlorocyclopentadiene
161. _____ [ ] HxCDDs (All hexachlorodibenzo-p-dioxins)
162. _____ [ ] HxCDFs (All hexachlorodibenzofurans)
163. _____ [ ] Hexachloroethane
164. _____ [ ] Hexachloropropylene
165. _____ [ ] Indeno (1,2,3-c,d)pyrene
270. _____ [ ] 3-Iodo-2-propynyl n-butylcarbamate (*)
166. _____ [ ] Iodomethane
167. _____ [ ] Isobutyl alcohol
168. _____ [ ] Isodrin
271. _____ [ ] Isolan (*)
169. _____ [ ] Isosafrole
170. _____ [ ] Kepone
171. _____ [ ] Lead
172. _____ [ ] Mercury--Nonwastewater from Retort
173. _____ [ ] Mercury--All others
174. _____ [ ] Methacrylonitrile
175. _____ [ ] Methanol
176. _____ [ ] Methapyrilene
272. _____ [ ] Methiocarb (*)
273. _____ [ ] Methomyl (*)
177. _____ [ ] Methoxychlor
178. _____ [ ] 3-Methylcholanthrene
179. _____ [ ] 4,4-Methylene-bis(2-chloroaniline)
180. _____ [ ] Methylene chloride

181. _____ [ ] Methyl ethyl ketone
182. _____ [ ] Methyl isobutyl ketone
183. _____ [ ] Methyl methacrylate
184. _____ [ ] Methyl methansulfonate
185. _____ [ ] Methyl parathion
274. _____ [ ] Metolcarb (*)
275. _____ [ ] Mexacarbate (*)
276. _____ [ ] Molinate (*)
186. _____ [ ] Naphthalene
187. _____ [ ] 2-Naphthylamine
188. _____ [ ] Nickel
189. _____ [ ] o-Nitroaniline (*)
190. _____ [ ] p-Nitroaniline
191. _____ [ ] Nitrobenzene
192. _____ [ ] 5-Nitro-o-toluidine
193. _____ [ ] o-Nitrophenol (*)
194. _____ [ ] p-Nitrophenol
195. _____ [ ] N-Nitrosodiethylamine
196. _____ [ ] N-Nitrosodimethylamine
197. _____ [ ] N-Nitroso-di-n-butylamine
198. _____ [ ] N-Nitrosomethylethylamine
199. _____ [ ] N-Nitrosomorpholine
200. _____ [ ] N-Nitrosopiperidine
201. _____ [ ] N-Nitrosopyrrolidine
277. _____ [ ] Oxamyl (*)
202. _____ [ ] Parathion
203. _____ [ ] Total PCBs (sum of all PCB isomers, or all Arochlors)
278. _____ [ ] Pebulate (*)
204. _____ [ ] Pentachlorobenzene
205. _____ [ ] PeCDDs (All pentachlorodibenzo-p-dioxins)
206. _____ [ ] PeCDFs (All pentachlorodibenzofurans)
207. _____ [ ] Pentachloroethane (*)
208. _____ [ ] Pentachloronitrobenzene
209. _____ [ ] Pentachlorophenol
210. _____ [ ] Phenacetin
211. _____ [ ] Phenanthrene
212. _____ [ ] Phenol
279. _____ [ ] o-Phenylenediamine (*)
213. _____ [ ] Phorate
214. _____ [ ] Phthalic acid (*)
215. _____ [ ] Phthalic anhydride
280. _____ [ ] Physostigmine (*)
281. _____ [ ] Physostigmine salicylate (*)
282. _____ [ ] Promecarb (*)
216. _____ [ ] Pronamide
283. _____ [ ] Propham (*)
284. _____ [ ] Propoxur (*)
285. _____ [ ] Prosulfocarb (*)
217. _____ [ ] Pyrene
218. _____ [ ] Pyridine
219. _____ [ ] Safrole
220. _____ [ ] Selenium
221. _____ [ ] Silver
222. _____ [ ] Silvex (2,4,5-TP)
223. _____ [ ] Sulfide
224. _____ [ ] 2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
225. _____ [ ] 1,2,4,5-Tetrachlorobenzene
226. _____ [ ] TCDDs (All tetrachlorodibenzo-p-dioxins)
227. _____ [ ] TCDFs (All tetrachlorodibenzofurans)
228. _____ [ ] 1,1,1,2-Tetrachloroethane
229. _____ [ ] 1,1,2,2-Tetrachloroethane
230. _____ [ ] Tetrachloroethylene
231. _____ [ ] 2,3,4,6-Tetrachlorophenol
232. _____ [ ] Thallium
286. _____ [ ] Thiodicarb (*)
287. _____ [ ] Thiophanate-methyl (*)
288. _____ [ ] Tirpate (*)
233. _____ [ ] Toluene
234. _____ [ ] Toxaphene
289. _____ [ ] Triallate (*)
235. _____ [ ] Tribromomethane (Bromoform)

236. _____	[ ]	1,2,4-Trichlorobenzene	244. _____	[ ]	1,1,2-Trichloro-1,2,2-trifluoroethane
237. _____	[ ]	1,1,1-Trichloroethane	290. _____	[ ]	Triethylamine (*)
238. _____	[ ]	1,1,2-Trichloroethane	245. _____	[ ]	tris-(2,3-Dibromopropyl)phosphate
239. _____	[ ]	Trichloroethylene	246. _____	[ ]	Vanadium (*)
240. _____	[ ]	Trichloromonofluoromethane	291. _____	[ ]	Vernolate (*)
241. _____	[ ]	2,4,5-Trichlorophenol	247. _____	[ ]	Vinyl chloride
242. _____	[ ]	2,4,6-Trichlorophenol	248. _____	[ ]	Xylenes--mixed isomers (sum of o-, m-, and p-xylene concentrations)
243. _____	[ ]	1,2,3-Trichloropropane	249. _____	[ ]	Zinc (*)

KEY TERMS/DEFINITIONS

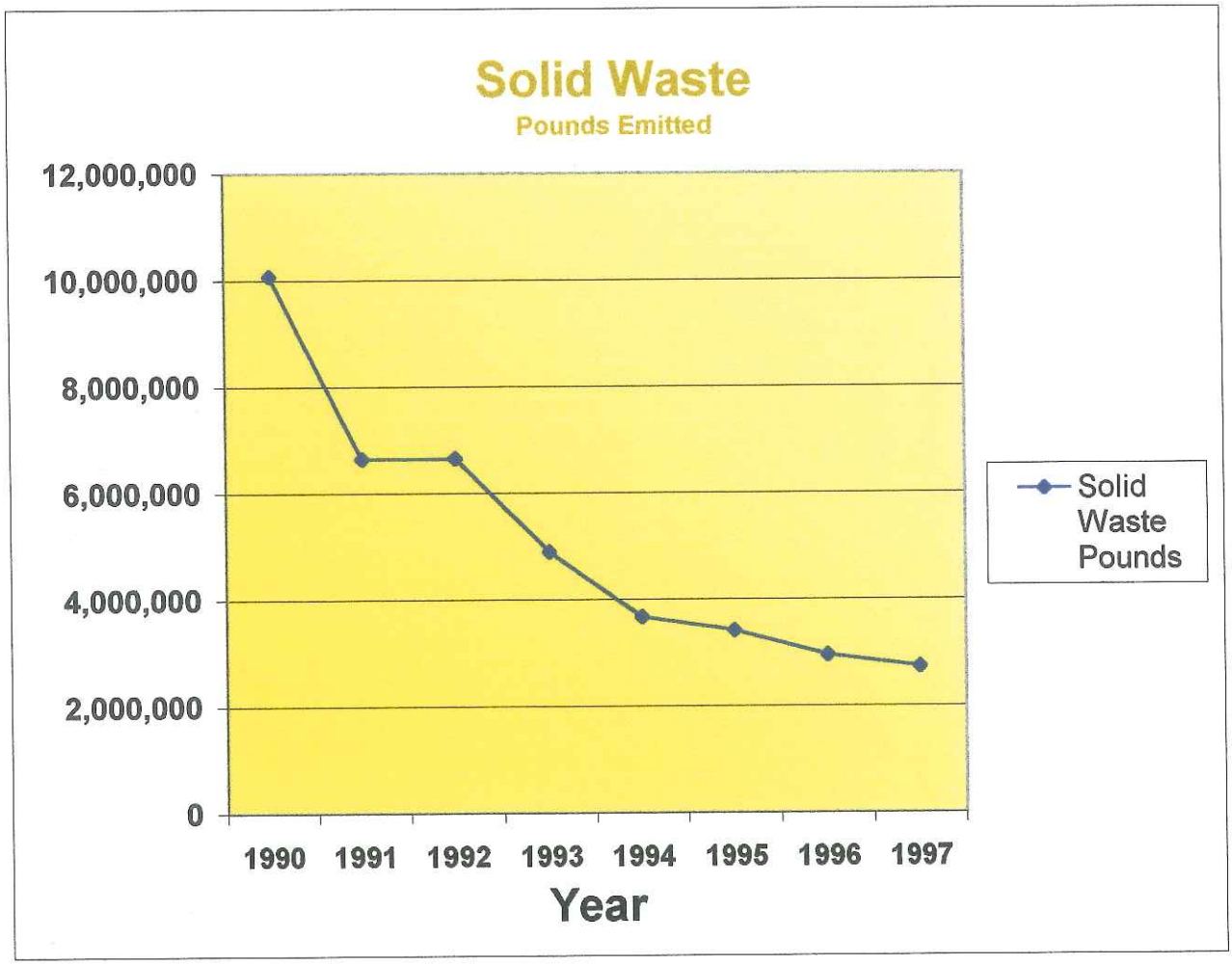
CONTAMINANTS SUBJECT TO TREATMENT (CSTT) are the specific constituents listed by waste code number in the Treatment Standard Table in §268.40. CSTT's must be identified for all hazardous debris wastes that are intended for treatment using one of the hazardous debris alternate treatment technologies described in §268.45.

REASONABLY EXPECTED TO BE PRESENT means that the generator is relying on knowledge of the raw materials used, the process, and potential reaction products, or on the results of a one-time analysis for the entire list of UHC's that may be present in the untreated hazardous waste. If a one-time analysis of the entire list of UHC's is conducted, subsequent analyses are required for only those pollutants which would reasonably be expected to be present in the waste as generated, based on the previous sampling and analysis results.

UNDERLYING HAZARDOUS CONSTITUENT (UHC) means any constituent listed in §268.48 Table UTS - Universal Treatment Standards (except vanadium and zinc) which can reasonably be expected to be present at the point of generation of the hazardous waste, at a concentration above the constituent-specific UTS treatment standard. [See 40 CFR 268.2]

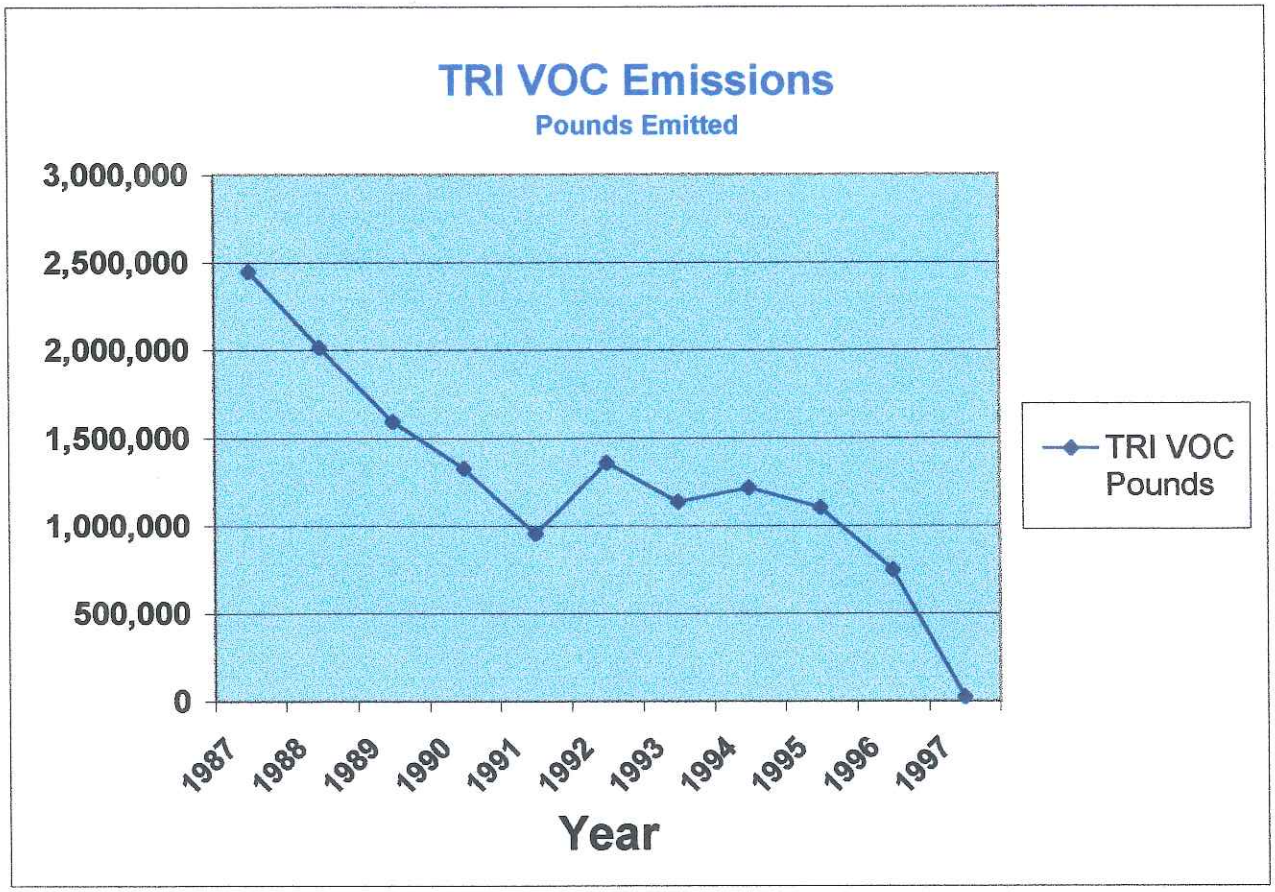
Columbus Coated Fabrics
Solid Waste
1990 to 1997

Year	Solid Waste Pounds	% Reduction
1990	10,066,000	Base Year
1991	6,640,000	34.04%
1992	6,642,000	34.02%
1993	4,891,520	51.41%
1994	3,666,000	63.58%
1995	3,414,000	66.08%
1996	2,950,000	70.69%
1997	2,732,000	72.86%



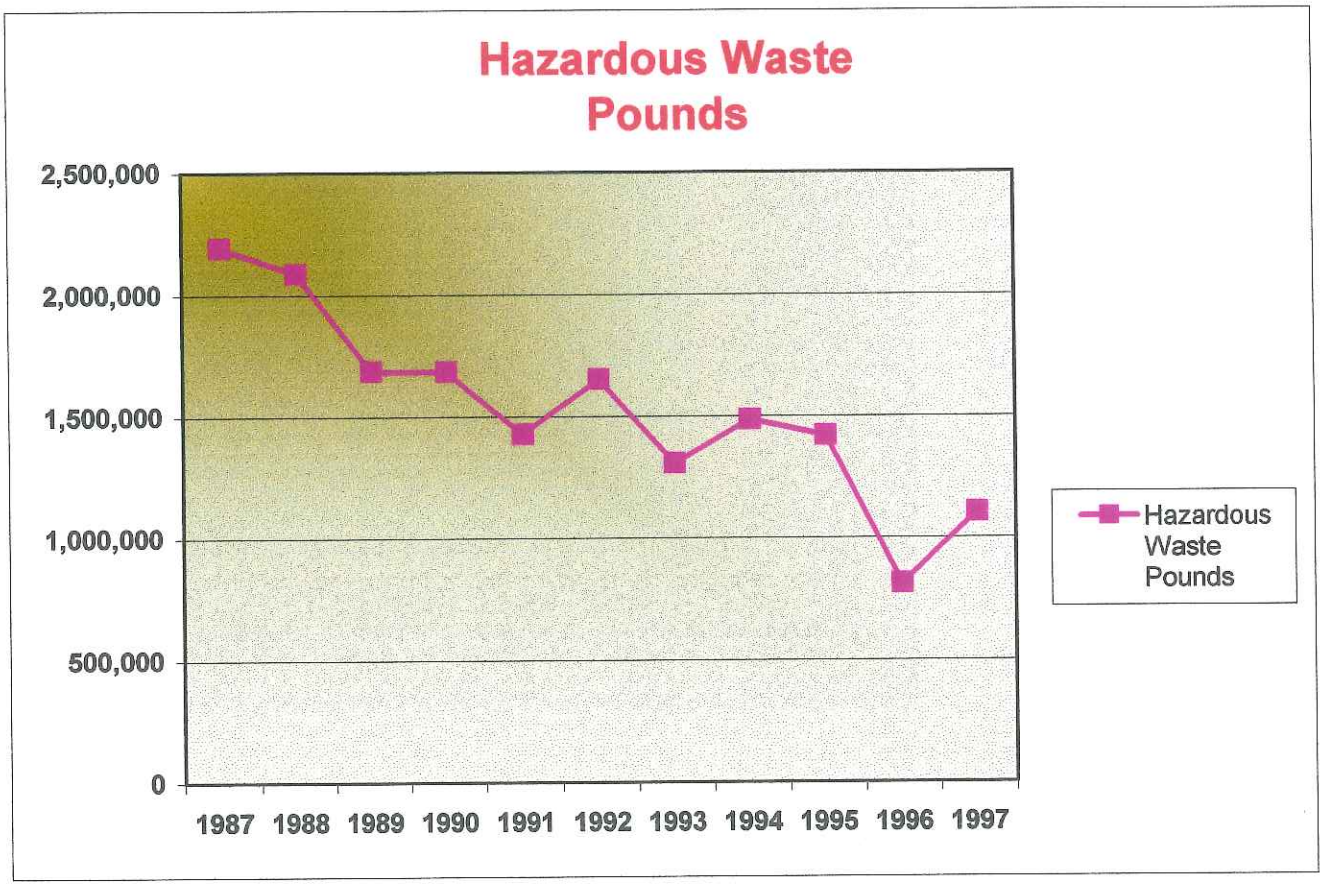
Columbus Coated Fabrics
Toxic Release Inventory VOC Emissions
1987 to 1997

Year	TRI VOC Emissions Pounds	% Reduction
1987	2,450,300	Base Year
1988	2,015,760	17.73%
1989	1,594,500	34.93%
1990	1,325,604	45.90%
1991	956,436	60.97%
1992	1,359,787	44.51%
1993	1,135,532	53.66%
1994	1,217,284	50.32%
1995	1,105,369	54.89%
1996	748,993	69.43%
1997	27,109	98.89%
1998		



Columbus Coated Fabrics
Hazardous Waste
1987 to 1997

Year	Hazardous Waste Pounds	% Reduction
1987	2,189,725	Base Year
1988	2,085,780	4.75%
1989	1,686,270	22.99%
1990	1,681,270	23.22%
1991	1,425,289	34.91%
1992	1,651,524	24.58%
1993	1,306,160	40.35%
1994	1,483,473	32.25%
1995	1,418,116	35.24%
1996	813,452	62.85%
1997	1,102,524	49.65%
1998		



Analytical 3 years

List of Wastes Generated at Decorative Surfaces International, Inc.

997 data

Site Activity:

Decorative Surfaces International, Inc. (DSI) is a manufacturer of vinyl films & vinyl wallcoverings which are printed and coated using a gravure process with both in-line and U-frame printers, primarily using solvent based inks. The vinyl films are used in many applications such as ready to assemble wood furniture, refrigerator handles & doors, microwave ovens, gypsum board, automobile trim, etc. The wallcoverings are primarily used in commercial applications such hospitals, hotels and motels. DSI begins its manufacturing process with raw resin. This resin is calendered into pliable vinyl in continuous rolls, usually 2 to 10 mils thick. Subsequent processes print, emboss, laminate to a fabric substrate (commercial wallcovering only), inspect and package the material for shipment.

Waste Handling:

The numbers for the waste streams below coincide with the numbers on the TCLP results.

1. **D005 & D006 (Waste Oil Blend Filter Bags)** is generated in the Calender Premix Department when all the liquid ingredients including cadmium stabilizers for making vinyl film are weighed, mixed, heated and pumped through a bag filter. The heated oil is sprayed into a blender of dry ingredients where it is mixed and the mixed blend is subsequently fluxed into plastic using a Banbury or Continuous mixer. This is manifested to Clean Harbors. 13 20 lbs

2. **D005 & D006 (Waste Baghouse Filter Cartridges & Bags)** are generated from the dust collectors for the Compound Blenders, Banbury's and Continuous Mixers. This is manifested to Clean Harbors. annual clean 100 24 year TCLP 81,600 lbs

3. **D001, D007, D008, D035, F003 & F005 (Waste Solvent Ink)** is generated in the Print Color Room and in South Mix and consists of waste ink which cannot be recycled. This is manifested to Clean Harbors. F086 less than 90 days 880,000 lbs Waste Ink Storage Area

4. **D001, D007, D008, D035, F003 & F005 (Waste Pan Wash Solids)** is generated in the Print Pan Wash Room during cleaning of print pans. The pans are used at the print presses to provide an ink reservoir for the gravure cylinders. The waste consists of ink sludge generated during the pan cleaning operation. This is manifested to Clean Harbors. F086 Bldg. 95 70 drums 1½ week 2 week Bldg. will have closure 39,000 lbs and item 3

Solvent is removed and put into solvent tank

Solid into drum once month

5. **D001, D007, D008, D035, F003 & F005 (Waste Print Rags)** are generated at the Printing Presses to clean the gravure cylinders and wipe out print pans. This is manifested to Clean Harbors.

6. **D008 (Waste Drum Wash Filters)** is generated from the water filter used in the Drum Wash Operation. The vacuum filter press operation removes small particulates from the water which would otherwise damage the High Pressure Water Drum Wash System pump. This is manifested to Clean Harbors.

7. **D001, D007, D008, D035, F003 & F005 (Waste Drum Wash Solid/Liquids)** is generated during the pre-cleaning operation prior to the Drum Wash operation. The empty 55 gallon drums and 27 gallon tubs previously used for in-process ink are mechanically scraped out prior to the drums passing through the High Pressure Water Drum Wash System. This is manifested to Clean Harbors.

8. **D002 & D007 (Waste Muriatic Acid)** is generated at Chrome Plating and is waste muriatic acid used to clean copper cylinders before they are re-plated with chrome. This is manifested to Clean Harbors.

9. **D002 & D007 (Waste Muriatic Acid Rags)** is generated at Chrome Plating when rags are used to wipe muriatic acid off of copper cylinders before they are re-plated with chrome. This is manifested to Clean Harbors.

10. **D007 (Waste Chromic Acid Rags)** is generated at Chrome Plating when rags are used to wipe chrome off of copper cylinders. This is manifested to Clean Harbors.

11. **D007 (Waste Spent Ink Stripper)** is generated at Chrome Plating and is waste spent ink stripper used to remove dried in ink from chrome gravure cylinders before they are re-plated. The rolls are re-plated when chrome wears off of the gravure cylinder and copper begins showing through or after a gravure cylinder is repaired. This is manifested to Clean Harbors.

12. **F006 (Limestone Sump Liquids)** is waste sump water generated at Chrome Plating from the wastewater treatment unit. This is manifested to Clean Harbors.

13. **F006 (Limestone Sump Solids)** is waste limestone generated at Chrome Plating from the wastewater treatment unit. This is manifested to Clean Harbors.

BORDEN DECORATIVE PRODUCTS
1280 NORTH GRANT AVENUE, P.O. BOX 208, COLUMBUS, OHIO 43216
TELEPHONE614-297-6000 • TELEX 246-670 • FAX 614-297-2996

June 21, 1996

Ms. Marcie Burrow
OEPA, Office of Pollution Prevention
1800 WaterMark Dr., P.O. Box 1049
Columbus, OH 43216-1049

Dear Ms. Burrow:

Please find attached the submission of nomination for the Governor's Award for Outstanding Achievement in Pollution Prevention.

If you have any questions or require additional information, please contact me at 614/297-6097.

Very truly yours,

Grover Thomas,
Manager of Health, Safety & Environment
COLUMBUS COATED FABRICS

GT/rap
attach.

bcc: R. Bradford
J. Saggese

Route:
M. Betts
M. McGroarty
G. Myres
G. Nuss
G. Rusincovitch
J. Sykes
J. Weaver

Governor's Award for Outstanding Achievement in Pollution Prevention

A. Cover Sheet - Applicant Information

Company Name:	Columbus Coated Fabrics (Borden, Inc.)
Company Address:	1280 N. Grant Avenue Columbus, OH 43201
Contact Person/Title:	Grover Thomas, Manager Health, Safety & Environment
Phone No: 614/297-6097	*FAX No:* 614/297-6079
No. of Employees: 425	*SIC Code:* 2295
Sponsors:	Michael E. Betts Joseph M. Saggese James C. Weaver
Contributors:	Michael McGroarty Glenn Myres Gary Nuss George Rusincovitch John Sykes Richard Tetrick Grover Thomas

General Description of Company:

Columbus Coated Fabrics (CCF), owned by Borden Inc., produces wallcoverings for commercial applications, decorative vinyl films that are laminated by customers to the surface of wallboard, wood and metal substrates for the manufacture of building panels, furniture, appliances and automotive items, and specialty vinyls for medical packaging and other uses.

B. SUMMARY

Columbus Coated Fabrics (CCF) participates in Ohio's Pollution Prevention Initiative and has already succeeded in meeting it's goal for the U.S. EPA's "33/50" Program. CCF has undertaken the following projects designed to prevent pollution. (** indicates that the project is considered to be an Input Change, a Product Reformulation, and/or a Production Process Redesign and/or Modification*):

1990 to Present * Worked with vendors to *increase reusable packaging* and *found outlets for scrap vinyl to reduce landfill* requirements. (66% reduction in waste including 5.5 million lbs. PVC recycled per year).

1991 * *Installation of a high pressure water system* in place of solvent to clean drums. (100 tons per year reduction in VOC emissions).

1991 to Present * *Reduced the (solvent) ink* required for production runs through recycling and installing low volume ink supply systems. (100 tons per year reduction in VOC emissions).

1980 to Present * *Maintaining tight head snap-on lids on all in-process drums* to minimize evaporative solvent losses. (45 tons per year reduction in VOC emissions).

1992 to Present * *Development of Non-Cadmium Stabilizers*. The CCF technical department has actively pursued the replacement of predominantly Cadmium-based vinyl stabilizers with non-cadmium-based vinyl stabilizers. All but a few minor products have now been converted, resulting in a significantly less toxic wastestream.

Reduction of City Water Usage. In 1992, CCF began a concentrated effort to reduce city water usage. By 1994, CCF had reduced its city water consumption by 51% primarily by utilizing on-site tower recirculating water in lieu of once-through City water. This amounted to a net reduction in water consumption of over 43 million gallons per year.

1993 * *A labor/management SQP (Safety, Quality and Productivity) team was formed to address waste reduction.* Waterbased ink was targeted as the focus wastestream. Operator education and process techniques were reviewed and modified, resulting in less waste. (20 tons per year reduction in non-hazardous waste).

1994 * *Replaced the solvent pan wash tank* with a re-designed low emission unit. (40 tons per year reduction in VOC emissions).

1995 *Installation of an $8 million air clean-up system* which includes temperature control of the print department's environment and reduction of air flows by 67%. This combination minimizes evaporation, decreases energy use for air movement, improves employee exposure levels and improves quality of the product (over 500 tons per year reduction in VOC emissions).

1996 * *Isolation of printer wash solvent* for disposal rather than combine it with reusable ink has improved ink quality and resulted in an overall decrease in scrap ink production of more than 30%. (150 tons in hazardous waste).

* *Reformulation of VOC coatings* has permitted the facility to eliminate the use of Triethylamine as a catalyst resulting in an annual decrease of more than 56,000 lbs. of emissions. Additionally, since the reformulation eliminated the need of a two component urethane coating system, the reformulated coatings did not create the volume of hazardous waste that the old coatings did. (70 tons per year reduction in hazardous waste and 28 tons of VOC emissions).

In total, projects undertaken by CCF since 1987 (the baseline year used for the U.S. EPA "33/50" Program) have eliminated more than 1000 tons (2,000,000 pounds) of various wastes and/or emissions, not including the 5.5 million pounds of PVC sent for off-site recycling annually.

C. NARRATIVE DESCRIPTION

Columbus Coated Fabrics (CCF), owned by Borden Inc., produces wallcoverings for commercial applications; decorative vinyl films that are laminated by customers to the surface of wallboard, wood and metal substrates for the manufacture of building panels, furniture, appliances and automotive items; and specialty vinyls for medical packaging and other uses. CCF is an active participant in Ohio's Pollution Prevention Initiative as well as the U.S. EPA "33/50" Program. CCF was recently the recipient of the Ohio Chemical Council's "Award for Responsible Care" (see appendix A), the OCC's highest honor for overall health, safety and environmental (HS&E) excellence.

CCF has made tremendous strides in reducing toxic emissions and generation of hazardous and solid waste and has already met it's U.S. EPA "33/50" commitment. These accomplishments are the result of a management team committed to health, safety, and environmental excellence from the senior operating managers at Borden to the site managers and associates at CCF. The key players of this team include Joseph M. Saggese, Executive Vice President of Borden, Inc. & Executive in Charge of CCF; Michael E. Betts, Group Vice President & General Manager; James C. Weaver, CCF General Manager; and George Rusincovitch, CCF Technical Manager. Additionally, scores of first-line CCF personnel have committed to the same level of health, safety and environmental excellence by participation in Pollution Prevention Program Teams and SQP (Safety, Quality and Productivity) labor/management teams.

From 1987 through 1995, CCF reduced Toxic Release Inventory (TRI) VOC emissions by 93.5% and hazardous waste by 35% (see appendix A). From 1990 to 1995, solid landfill waste was reduced by 66% (see appendix A).

DESCRIPTION OF PROJECT, PROGRAM OR TECHNOLOGY:

Descriptions of some of the many projects noted in the narrative which have lead to the steady reduction in VOC emissions and hazardous waste include:

1. *The purchase and installation of a high pressure water wash system* in place of solvent to clean drums. This wash system uses high pressure, filtered, recirculated water, which literally blasts the ink solids off of the surface of the drums. The previous drum wash system used solvent to dissolve the ink, resulting in the generation of significant VOC emissions (100 tons) and hazardous waste.

2. *The replacement of the solvent pan wash tanks* with one redesigned low emission unit purchased from Safety Kleen. Previously, three (3) pan wash units were used to clean ink pans from gravure printing presses. These older units were put into service at a time in history when solvent headspace/evaporation issues were not well recognized and a lot of solvent was evaporated off by the process, annually. According to AP-42 estimates, the new unit will have a maximum emission rate of 9.38 tons per year. The old units were rated at approximately 49 tons per year.

3. *Maintain tight head snap-on lids on all in-process drums.* In 1992, TRC performed a RACT study at the CCF facility to determine the source of emissions. It was determined that fugitive emissions from open drums of solvent based inks accounted for approximately 10 tons of VOC emissions per year, significantly lower than the 55 tons of emission experienced prior to use of special snap-on flexible covers for drums in the print department. A study documented that consistent use of the snap-on lids would virtually eliminate this source of evaporative loss.

4. *Reformulation of existing VOC coatings.* CCF's technical group examined existing urethane coatings. These coatings had a high scrap rate due to the coating's two (2) component nature, required the use of Triethylamine as a catalyst and exhibited relatively high VOC emission loadings. The reformulation of these coatings utilized existing single component coatings, modified for this application, but eliminating the 70 tons per year of scrap hazardous waste inherent to a two (2) component system. The new (reformulated) coatings also did not require Triethylamine as a catalyst which will reduce VOC emissions by 28 tons per year.

5. *Reformulation/replacement of existing high cadmium vinyl stabilizers with low cadmium vinyl stabilizers.* In 1992, CCF's technical personnel began attempts at replacing high cadmium vinyl stabilizers in several formulations, with vinyl stabilizers having low cadmium concentrations. In 1996, all of CCF's vinyl wallcoverings are free of cadmium without an appreciable effect on production. This change also eliminated the toxicity of a waste stream in the production process.

6. *Reducing the solvent (ink) required for production runs and the generation of scrap ink through recycling, installing low volume ink supply systems, and isolation of printer wash solvent from scrap ink.* Personnel from the print department discovered that solvent inks could be retained and reused from one run to the next, rather than scrap everything that was left over after a print run. Additionally, smaller print pans, recirculating pumps and transfer lines were installed to minimize the amount of ink necessary to "charge" the system. The savings achieved by these changes from 1987 to 1992 were significant, but, plateaued in 1993-1995. In 1996, it was determined that the wash solvent operators were using to clean gravure rollers and allowing to return to the ink reservoirs could be isolated from scrap ink and collected separately for reuse. This resulted in the ability to stretch the use of wash solvents without quality impact, an improvement in ink quality and reusability, and significantly less waste ink. Together, hazardous waste was reduced by 150 tons per year.

7. *Installation of an $8M air clean-up system.* For years, CCF had appeared as the company with the highest emissions in Franklin County on the TRI reported by the Ohio EPA. Initially aiming to meet EPA requirements, the CCF team decided to go further and control as many sources of emissions as possible and chose to install a clean-up system from DÜRR Industries (Plymouth, Michigan). It allowed CCF to continue manufacturing its current range of products just as it always had, avoiding the operating, product, and economic limitations of trying to switch to other processes and reduced VOC air emissions by 93%.

8. *Reduction of City water usage.* In 1992, CCF began a concentrated effort to reduce city water usage. By 1994, CCF had reduced its water consumption by 51% primarily by utilizing an on-site tower recirculating water in lieu of once-through City water. This amounted to a net reduction in water consumption (and the discharges of that water) of over 43 million gallons per year. It was accomplished in three phases:

   Phase I - Connect cooling load in series
   Phase II - Transfer cooling loads to tower water.
   Phase III- Install sewer deduct meters where appropriate.

9. *Waterbased ink process review and modification.* In 1993, a Safety, Quality and Productivity (SQP) Pollution Prevention team was formed, charged with the task of reviewing existing wastestreams and developing ways of minimizing them. Waterbased ink was selected, since the raw material is expensive and large quantities of waste were being generated in relation to the product produced. Members of the committee studied the way in which waterbased ink was used in the various printing applications and determined that there were better ways to "draw down" colors, resulting in better, faster and less costly color matching. The process affected the total scrap rate, since inks were not being "overshot" in an effort to maintain viscosity and color.

   CCF has formed a Pollution Prevention team as part of the Pollution Prevention Initiative Program submitted earlier this year. That team will be meeting to assess the remaining wastestreams for possibilities of waste minimization.

10. *Finding a market for scrap vinyl.* For the last five (5) years, the CCF Purchasing department has attempted to find a market for scrap vinyl rather than send it to the landfill. Their attempts to find companies who recycle it into various consumer products (purses, sandals, etc.) has achieved great success with over 5.5 million pounds being recycled per year.

11. *Increase reusable packaging and reduce landfill requirements*. CCF Purchasing personnel have worked diligently with suppliers to assure that appropriate packaging is being used for all incoming raw materials. This has meant the use of reusable or minimal packaging wherever possible.

This is part of an ongoing effort to develop products with a minimum impact on people and the environment and a product risk management strategy which carefully guides the selection and use of specific raw materials based on hazard and exposure criteria.

In summary, CCF is an environmentally responsible manufacturer committed to producing quality products that reflect responsible and balanced health, safety, and environmental values. The on-going investment in time and resources in state-of-the-art technology, process review, source reduction, chemical reformulation and dedicated, trained personnel, as well as waste reductions in excess of 1000 tons since 1987, demonstrate this commitment to good stewardship and CCF's leadership in its industry as a responsible manufacturer.

ENVIRONMENTAL BENEFITS:

1. *The purchase and installation of a high pressure water system.* Prior to installation of the new high pressure water wash system, solvents were used to dissolve/remove the inks. The old system created more than 100 tons of air emissions, hazardous waste and presented a constant risk of leaks and spills. The new high pressure water wash system uses filtered, recycled water to remove ink solids. The small quantity of concentrated ink solids remaining must be discarded as a hazardous waste. The recycled water can be reused repeatedly until dissolved solids become too high at which time it is discarded off-site as a non-hazardous waste. The new system results in a lower toxicity waste and an overall reduction of more than 100 tons of VOC emissions.

2. *The replacement of three (3) solvent pan wash tanks* with one redesigned low emission unit reduced solvent losses by 40 tons per year based on AP-42 calculations for controlled and uncontrolled cold cleaners.

3. *Maintaining tight head snap-on lids on all process containers*. The snap-on flexible lids on all process containers prevents the evaporative loss of volatile organics to the air. Original measured losses due to open containers and loose fitting lids was approximately 55 tons per year and only 10 tons today. This practice significantly stops those losses, thus reducing VOC emissions by approximately 45 tons per year. Progress is measured by visual departmental walkthroughs.

4. *Reformulation of existing VOC coatings* CCF's technical group examined existing urethane coatings and found that there were existing coatings already in CCF's system capable of providing similar performance characteristics. The resulting elimination of Triethylamine use (a catalyst in the two-component system), means a 56,000 pound decrease in annual emissions. The single component coatings eliminate 70 tons of the hazardous waste. This savings is documented by year to year hazardous waste records and Triethylamine purchasing records.

5. *Reformulation/replacement of existing high cadmium vinyl stabilizers with low cadmium vinyl stabilizers*. Since 1992, CCF technical personnel have worked toward replacing high cadmium vinyl stabilizers with low cadmium stabilizers. Today, virtually all CCF wallcoverings are free of cadmium. Success can be measured in terms of the reduced toxicity of a "dust stop oil" wastestream that used to be saturated with residual cadmium and which is now no-hazardous.

6. *Reducing the solvent (ink) required for production runs and the generation of scrap ink through recycling, installing low volume ink supply systems and isolation of printer wash solvent from scrap ink.* The reduction of waste solvent ink due to the combination of reducing the solvent (ink) required for production runs and the installation of low volume ink supply systems has reduced waste solvent ink by approximately 100 tons from its 1987 levels. However, the recent change involving the collection and isolation of printer wash solvent from scrap ink should mean an additional 35% savings (150 tons annually). This can be monitored and confirmed by the annual hazardous waste generator's report submitted to the Ohio EPA annually.

7. *Installation of an $8M air clean-up system.* On an annual basis, the abatement system achieves a 93 percent reduction of TRI emitted volatile organic compounds, from the former 1.1 million pounds (an amount permitted by current regulations) to just 74,000 pounds. This reduction is tracked by means of a continuous emissions rate monitor (CERM) which continuously calculates pounds of VOC emitted. This can be compared to the SARA 313 reports submitted annually since 1987. Based on the Ohio EPA's 1994 TRI summary, CCF's ranking would have dropped from #26 in the state to #300 or lower.

8. *Reduction of City water usage.* Total water saved by this project exceeds 43,000,000 gallons per year. This can be measured through water and sewer billing as well as the daily utilities checks performed by CCF maintenance personnel.

9. *Waterbased ink process review and modification.* While difficult to measure directly because of fluctuations in production and taking machinery out of service, it appears that the waterbased ink process review and modifications have reduced waste by approximately 20 tons. This is measured by production yardage calculations and waste logs.

10. *Finding a market for scrap vinyl.* In 1995, 5,554,226 pounds of vinyl were recycled using the sources detailed above. This can be tracked through sales records to purchasers of this product. As a result of these efforts and the efforts detailed in item #11, below, CCF has been awarded the White Glove Award by the Waste Authority of Central Ohio Industrial Waste Management Task Force for waste minimization (See Appendix A).

11. *Increase reusable packaging and reduce landfill requirements.* The CCF purchasing department keeps track of loads of trash to the landfill. Their records indicate that due to the marketing of scrap vinyl (above) and the increase in reusable packaging and the resulting reduction in landfill requirements, a 66% decrease in the number of loads to the landfill since recordkeeping began five (5) years ago.

SUMMARY:

In all, there is documentation to indicate that more than 1,000 tons of waste and air emissions and more than 43,000,000 gallons of water discharges have been eliminated from CCF's annual totals since 1987.

HEALTH & SAFETY BENEFITS:

1. *The purchase and installation of a high pressure water system.* The previous drum wash system relied on solvents to clean drums. The potential for employee exposure to solvents was much greater with the previous system since the new waterbased system presents no employee exposure problems at all. A waterbased system also presents little if any risk of fire, unlike the previous solvent based system and requires no intrinsically safe systems.

2. *The replacement of three (3) solvent pan wash tanks* with one redesigned low emission unit will significantly reduce employee exposure and reduce the risk of fires and explosions.

3. *Maintaining tight head snap-on lids on all process containers.* Any time lids are off of containers, especially containers of solvent, the opportunity for employee exposure is great. Maintaining tight head snap-on lids on all process containers minimizes this opportunity and reduces the risk of fires and explosions.

4. *Reformulation of existing VOC coatings.* The new lower VOC coatings have fewer VOC's to evaporate off, therefore, less exposure potential. Additionally, the reformulated coatings have eliminated the need for Triethylamine as a catalyst, the presence of reacted isocyanates and the handling of numerous hazardous waste drums.

5. *Reformulation/replacement of existing high cadmium vinyl stabilizers with low cadmium vinyl stabilizers.* All of CCF's vinyl wallcoverings are now free of cadmium after an extensive product development process. This is part of an ongoing effort to develop products with a minimum impact on people

environment and a product risk management strategy which carefully guides the selection and use of specific raw materials based on hazard and exposure criteria.

6. *Reducing the solvent (ink) required for production runs through recycling and installing low volume ink supply systems.* Reducing the solvent (ink) required for production runs in turn means a drop in the total quantity of ink staged in the print department. Less ink in the system means less fuel in the event of a fire and less potential for employee exposure.

7. *Installation of an $8M air clean-up system.* Installation of this system included the installation of a 100% total enclosure and redesign of the entire ventilation of the print department. This enabled the company to better protect employees and improve exposure levels by placing exhaust intakes closer to the source. Additionally, installation of the DÜRR concentrator/thermal oxidizer means that the environment and the health and safety of the entire population are that much more secure.

8. *Reduction of City water usage.* Water reductions of this magnitude (43 million gallons) are not just reflected at the CCF facility but are felt at the City of Columbus Water and Sewerage treatment plants, also. The decrease loadings mean that much less water the City will have to treat.

9. *Waterbased ink process review and modification.* Decreased color match time, decreased waste and decreased material handling means more efficient employees and less opportunity for them to hurt themselves.

10. *Finding a market for scrap vinyl.* Scrap vinyl, sold to a recycler means that less virgin vinyl will be produced to fuel the needs of that manufacturer. It means fewer loads to the landfill, protecting not only CCF employees, but landfill and transportation employees.

11. *Increase reusable packaging and reduce landfill requirements.* Decreases in the amount of packaging translates directly to fewer industrial accidents. Packaging must be removed and disposed of. The more employees are required to handle paper, cardboard, drums and wood products the more chance there is of injury.

MANAGEMENT COMMITMENT:

CCF has made tremendous strides in reducing toxic emissions and generation of hazardous and solid waste. These accomplishments are the result of a management team committed to health, safety, and environmental excellence from the senior operating managers at Borden to the site managers and associates at CCF.

At management's direction, CCF has undertaken pollution prevention projects which, when combined, have already enabled it to meet it's U.S. EPA "33/50" commitment, to reduce its Toxic Release Inventory (TRI) VOC emissions by 93.5% and hazardous waste by 35%, and to reduce its solid landfill waste by 66%.

CCF management has encouraged the formation of Safety, Quality and Productivity (SQP) teams to address waste minimization. Participants in the SQP program shares the rewards realized by the efforts of the various teams through bonuses paid quarterly when predetermined indices are achieved. This commitment cost CCF $89,900 the last year figures were available.

As further evidence of it's commitment, CCF/Borden spent in excess of $8.5 million in capital on environmental improvements during 1996.

Additionally, CCF management has made the time and resources of a group of ten individuals to serve on CCF's Ohio Pollution Prevention Initiative Team and who will meet on a quarterly basis to review the potential minimization of appropriate waste streams.

TRANSFERABILITY:

As a result of the tremendous effort and unique technology utilized by CCF in the installation of the DÜRR concentrator/thermal oxidizer system, the Ohio EPA has used this facility as an example for other industries of just what CAN be done. Tours are given by knowledgeable individuals for any interested group and/or company, technology is shared and information is provided to the best of the company's ability. DÜRR Industries has made themselves available, on the company's behalf to discuss the system at seminars and workshops.

CCF has attended all of the meetings held by the State of Ohio Pollution Prevention Initiative group in an effort to both share what has been learned through this process and to learn from others what may still be accomplished.

ECONOMIC BENEFITS:

Significant benefits have been realized from the minimization of hazardous and non-hazardous wastes. Despite periods of increased production, drummed and bulk disposal costs have plummeted from $246,260 in 1993 to $151,250 in 1995. The associated raw material cost avoidance during those three years as a result of waste minimization was a total of $861,320.

Use of high pressure water in the drum washer saves $70,000 per year in raw material costs.

Use of snap-on flexible lids on containers in the print department saves an estimated $31,500 per year.

The avoidance of 20 tons of waterbased ink waste at a cost of non- per pound saves an estimated $48,200 per year.

Urethane coatings are purchased at the cost of non-responsive . CCF internal replacement coatings are made for approximately non- per pound for a savings of non-responsive . Based on 1995 urethane coating quantities (63,210#), this translates to a savings of $266,110 per year.

The price for the sale of scrap vinyl varies widely, so it will not be included in this calculation, but a significant return is realized on this endeavor.

The installation of the new DÜRR clean-up system resulted in more than a 24-fold reduction in anticipated natural gas usage as a result of incorporating concentrators into the design over a stand alone oxidizer saving $375,000 per year in utility costs (gas & electric).

TOTAL ANNUAL COST SAVINGS (as a result of these activities) = $ 1,698,940.

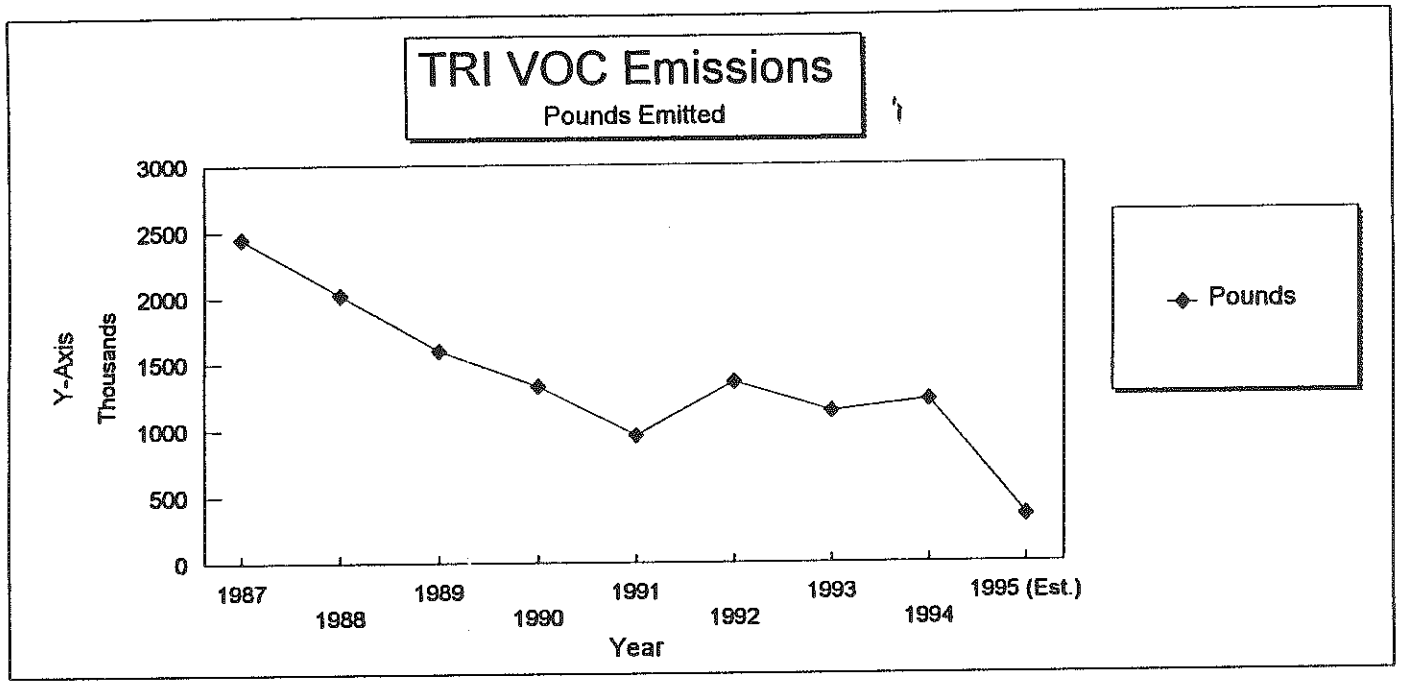
APPENDIX A

Columbus Coated Fabrics

Toxic Release Inventory VOC Emissions

1987 to 1995

Year	TRI VOC Emissions Pounds	% Reduction
1987	2,450,300	Base Year
1988	2,015,760	17.734
1989	1,594,500	34.926
1990	1,325,604	45.900
1991	956,436	60.967
1992	1,359,787	44.505
1993	1,135,532	53.657
1994	1,217,284	50.321
1995 (Est.)	354,104	85.549

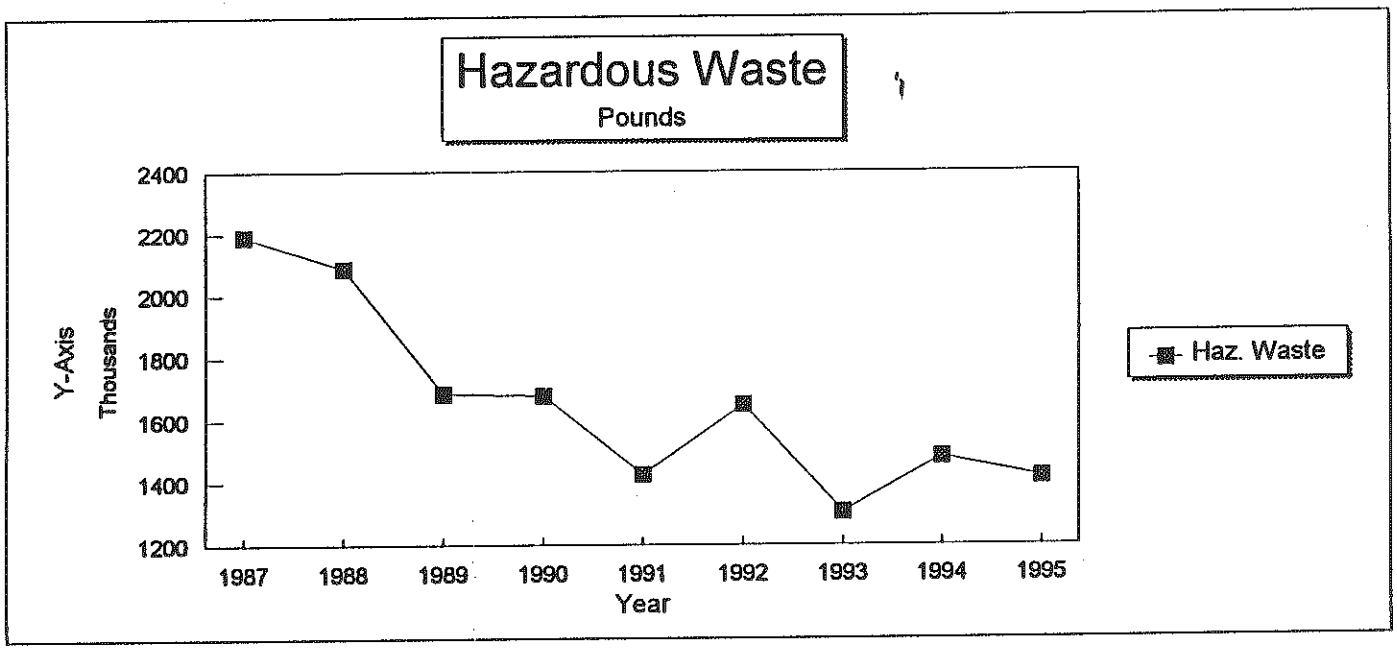


Columbus Coated Fabrics

Hazardous Waste

1987 to 1995

Year	Hazardous Waste Pounds	% Reduction
1987	2,189,725	Base Year
1988	2,085,780	4.747
1989	1,686,270	22.992
1990	1,681,270	23.220
1991	1,425,289	34.910
1992	1,651,524	24.578
1993	1,306,160	40.351
1994	1,483,473	32.253
1995	1,418,116	35.238

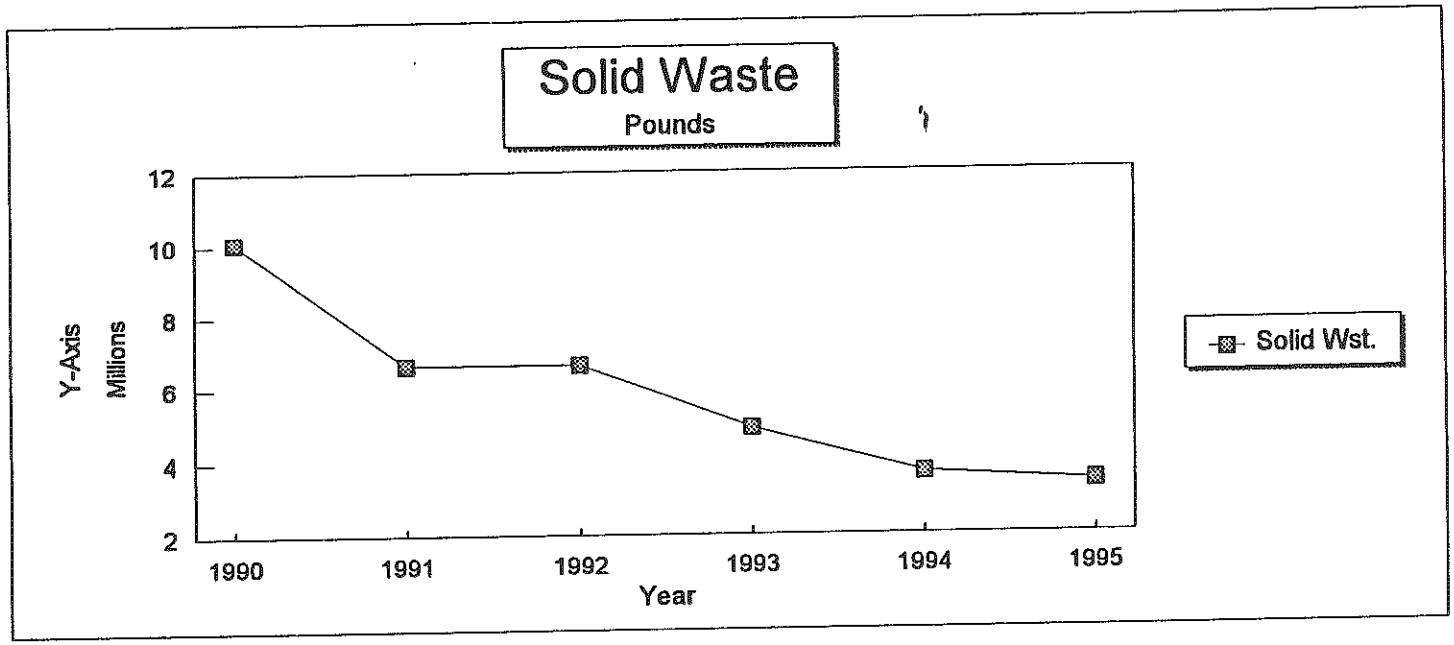


Columbus Coated Fabrics

Solid Waste

1990 to 1995

Year	Solid Waste Pounds	% Reduction
1990	10,066,000	Base Year
1991	6,640,000	34.035
1992	6,642,000	34.015
1993	4,891,520	51.406
1994	3,666,000	63.580
1995	3,414,000	66.084



WORLDWIDE HEALTH, SAFETY & ENVIRONMENTAL POLICY AND PRINCIPLES

Borden is committed to health, safety and environmental excellence throughout our worldwide operations, both to live up to our social responsibilities and as a means to build the value of our businesses. Each business will strive to meet the same global Health, Safety and Environmental standards of excellence wherever it operates. Excellence means integrating health, safety and environmental planning and execution into all business activities, complying with the law, conserving natural resources, responsibly managing environmental, health and safety risks, and working collaboratively with others in addressing issues and opportunities.

Associates

Borden recognizes that Associates are our most important asset, and seeks to provide a work environment that is safe and healthy.

Product Stewardship

Borden strives for health, safety and environmental excellence in managing our products through all phases of their life cycles.

Conservation

Borden works toward conservation of natural resources and reduction of any negative impact on air, water or land with an ultimate goal of zero discharge and optimized energy usage.

Compliance

Borden considers legal compliance a fundamental requirement.

Total Quality Improvement

Borden commits to continual progress in health, safety and environmental performance.

Stakeholder Partnership

Borden pursues creative solutions to health, safety and environmental challenges and works in partnership with our stakeholders to achieve safe and sound environments both in the workplace and beyond for the protection of our Associates and all other stakeholders.

Ohio Chemical Council

Annual Award Winner

1995

Presented to

BORDEN, INC.--COLUMBUS COATED FABRICS

For overall excellence in health, safety, and environmental programs

Peggy J. Smith
Executive Director

May 23, 1996
Date

Responsible Care is a registered Servicemark of the Chemical Manufacturers Association

17 South High Street
Suite 410
Columbus, Ohio 43215
614-224-1730
Fax: 614-224-5168

Contact: Peg Smith, Ohio Chemical Council
614-224-1730

Tony Kozlowski, BP Chemicals
216-586-5577

Chemical Companies Reap Environmental Awards

COLUMBUS, May 23, 1996 -- Eleven chemical companies with operations in Ohio were honored today by the Ohio Chemical Council (OCC) for innovative programs and a wide range of achievements in pollution prevention, health and safety programming, and open communications in their respective communities.

Three of those companies received the "Award for Responsible Care™" -- OCC's highest honor for overall health, safety and environmental (HSE) excellence -- at the group's annual conference today in Columbus. The companies are:

Class 1 (facilities with under 100 workers) -- **BASF Corporation (Whitehouse)**
Class 2 (facilities with 101 to 500 workers) --**Columbus Coated Fabrics (owned by Borden, Inc.)**
Class 3 (facilities with more than 500 workers) -- **Quantum Chemical Company (Cincinnati)**

Following is the complete list of winners in all categories:

COMMUNITY OUTREACH
Class 1 -- **BASF Corporation Automotive Refinish Research Laboratory, (Whitehouse, Oh.)**
Class 2 -- **PPG Industries, Inc. (Barberton)**
-- **PPG Industries, Inc. (Circleville)**
Class 3 -- **Lubrizol Corp. (Wickliffe)**
-- **Quantum Chemical Company (Cincinnati)**

POLLUTION PREVENTION
Class 1 -- **BASF Corporation Automotive Refinish Research Laboratory, (Whitehouse)**
Class 2 -- **Chevron Chemical Company (Marietta)**
Class 3 -- **The Geon Company (Avon Lake)**
-- **E.I. DuPont de Nemours Co., (Circleville)**

-- more --

HEALTH & SAFETY

Class 1 -- **BASF Corporation, Automotive Refinish Research Laboratory,**
Class 2-- **BP Lima Chemicals**
-- **B.F. Goodrich (Akron)**
Class 3 -- **Bayer Corp. (Port Plastics plant)**
-- **The Geon Company (Avon Lake)**
-- **E.I. DuPont de Nemours Co., (Circleville)**

Winners were selected by 15 judges representing higher education, the media, communications, Ohio EPA, and other areas and organizations.

Robert Hukill, president of Hukill Chemical Corp. and outgoing president of the Ohio Chemical Council (OCC), presented this year's awards.

"Ohio's chemical companies exemplify the chemical industry's strong commitment to continuous improvement in health, safety and environmental performance," Hukill said. "As today's awards demonstrate, we're setting the pace in proactive, innovative programs that lead to a better environment and protect the health and well-being of our workers and communities."

Hukill pointed out that OCC member companies have reduced toxic chemical emissions, or "releases to the environment" by more than 50 percent since 1987 at a cost of millions of dollars. In terms of safety, the chemical industry is a national leader. From 1980 to 1990, the National Safety Council rated the U.S. chemical industry among the safest manufacturing industries in the country, having achieved the #1 ranking in four of those years.

The OCC developed the Responsible Care™ Awards program to share industry successes that other companies can follow and to raise public awareness of the significant effort the chemical industry is making to improve HSE performance.

The Ohio Chemical Council is a trade association for the state's chemical industry. Its 100+ members range from America's largest chemicals producers to smaller specialty production and distribution companies. The Ohio chemical industry is the fifth largest in the nation, with 65,000 employees and more than $14 billion in chemical shipments each year.

Responsible Care™ is the framework the U.S. chemical industry has chosen to improve HSE performance nationwide, and communicate openly with the public. The program is coordinated by the Chemical Manufacturer's Association (CMA) which represents about 90% of the U.S. chemical industry.

"Responsible Care represents a new attitude for the chemical industry," says Fred Webber, said. "The Ohio Chemical Council's innovative awards program truly exemplifies this new attitude. All entries -- but particularly the award winners -- demonstrate that industry is going beyond existing laws to enhance health, safety and environmental performance. I encourage other states -- and other industries -- to follow this example."

###

A BEAUTIFUL COUNTY BEGINS WITH YOU!

1995 WHITE GLOVE
HONORABLE MENTION

IS PRESENTED TO

COLUMBUS COATED FABRICS

FOR CONTRIBUTIONS YOU HAVE MADE TOWARD CONSERVING, PROTECTING AND PRESERVING FRANKLIN COUNTY'S VALUABLE NATURAL RESOURCES.

THANK YOU FOR HELPING US KEEP FRANKLIN COUNTY BEAUTIFUL!

1995 WHITE GLOVE • HONORABLE MENTION •

CHAIR
KEEP FRANKLIN COUNTY BEAUTIFUL, INC.

EXECUTIVE COORDINATOR
KEEP FRANKLIN COUNTY BEAUTIFUL, INC.

SOLID WASTE AUTHORITY OF CENTRAL OHIO

Funded by Division of Recycling and Litter Prevention, Ohio Department of Natural Resources, George V. Voinovich, Governor.

KEEP AMERICA BEAUTIFUL

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No.: O H D 0 8 4 2 9 4 3 5 1

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Decorative Surfaces Int l
1280 North Grant Avenue
Columbus, OH 43201

4. Generator's Phone (614 297-6097

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: Clean Harbors Env. Services, Inc

6. US EPA ID Number: M A D 0 3 0 3 2 2 3 5 9

C. State Transporter's ID

D. Transporter's Phone 781 849-1868

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Spring Grove Resource Recovery
4879 Spring Grove Avenue
Cincinnati, OH 45232

10. US EPA ID Number: O H D 0 6 0 8 1 6 6 2 9

G. State Facility's ID

H. Facility's Phone 513 681-5738

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, (D002, D004, D007), WASTE CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S. (MURIATIC ACID), 8, UN3265, II	X	001	DM	00055	L	D002 D004 D007
b.	RQ,HAZARDOUS WASTE LIQUID, N.O.S. (CHROMIUM), 9, NA3082, III	X	001	DM	00055	L	D007
c.	RQ,HAZARDOUS WASTE LIQUID, N.O.S. (BARIUM, CADMIUM)(D006), 9, NA3082, III	X	001	DM	00055	L	D005 D006
d.	RQ, WASTE CORROSIVE LIQUIDS,ACIDIC,ORGANIC,N.O.S. (MURIATIC ACID,CHROMIUM)(D002,D007),8,UN3265,III	X	001	DM	00055	L	D002 D007

J. Additional Descriptions for Materials Listed Above
11a U64729
11b U40445
11c U56465
11d U56464

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
WO# D6117164
IN EMERGENCY, CALL CHES 1-800-645-8265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

Style CF 17 LABELMASTER, AN AMERICAN LABELMARK CO., CHICAGO, IL 60646 (800)621-5808

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Clean Harbors has appropriate permits for & will accept the waste the generator is shipping.

PRINTED ON RECYCLED PAPER

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 Manifest No. 00697

THE HAZARDOUS WASTES IDENTIFIED ON THE HAZARDOUS WASTE MANIFEST IDENTIFIED ABOVE AND BEARING THE EPA HAZARDOUS WASTE CODES LISTED BELOW ARE RESTRICTED WASTES WHICH ARE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT UNDER THE LAND DISPOSAL RESTRICTIONS, 40 CFR PART 268 AND RCRA SECTION 3004(D). IN ACCORDANCE WITH 40 CFR 268.7(A)(1), THE EPA WASTE CODE, WASTE SUBCATEGORY, AND TREATABILITY GROUPS, AS APPLICABLE, ARE INCLUDED BELOW.

INSTRUCTIONS -- COMPLETE ALL SECTIONS. REFER TO PAGE 3 OF THIS FORM FOR KEY TERMS/DEFINITIONS.
Column 1 - Line Item: Enter the manifest line item number (e.g., 11a) that corresponds to the waste code(s).
Column 2 - Waste Codes/Subcategory: Check off all applicable waste codes. For D001 through D043, also check applicable subcategory; for F001 through F005, check applicable constituents.
Column 3 - Wastewater/Non-wastewater: Check off "WW" for wastewater and "Non-WW" for non-wastewaters.
Column 4 - LDR Handling Code: Circle the appropriate handling code, as follows:

1 = The waste is a characteristic hazardous waste D001, D002, D003, or D018-43 which is intended for treatment/disposal in a CWA system, CWA-equivalent system, or Class I SDWA system. Underlying Hazardous Constituents (UHC's) are NOT required to be identified.

1A = The waste is a characteristic hazardous waste D001 High TOC Ignitable Liquids Subcategory (i.e., greater than or equal to 10% TOC). Pursuant to 40 CFR 268.40, the waste must be treated using organic recovery (RORGS) or combustion (CMBST) technology. UHC's are NOT required to be identified.

2 = The waste is a characteristic hazardous waste D001 (other than High TOC Ignitable Liquids), D002, D003 Explosive, Water Reactive or Other Reactive subcategory, D012-17 non-wastewater, or D018-43 which is intended for treatment/disposal in a non-CWA system, non-CWA-equivalent system, or non-Class I SDWA system located in the United States. All UHC's which are reasonably expected to be present must be identified, except for D001 waste that is intended to be treated using organic recovery (RORGS) or combustion (CMBST) technologies. Identify UHC's by completing Sections I and IV of CHI Form LDR-1 Addendum and attach completed Addendum to this form.

3 = The waste is a characteristic (i.e., D-code) or listed (i.e., F-, K-, U-, or P-code) hazardous waste which is intended for export and treatment/disposal at a facility located outside the United States. LDR treatment standards do not apply to hazardous waste treated/disposed in a foreign country, and per USEPA guidance, the identification of UHC's (if applicable) is not required for hazardous waste that is intended to be exported. Note however that if the exported waste is subsequently returned for treatment/disposal in the United States, all applicable LDR regulations would apply and a revised LDR notification would be required.

4 = The waste meets the definition of hazardous debris pursuant to 40 CFR 268.2(h) and is intended for treatment/disposal in compliance with the alternate debris treatment technologies of 40 CFR 268.45. In accordance with the requirements of 40 CFR 268.7(a)(1)(iv)(A): (1) "This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45"; and (2) the contaminants subject to treatment (CSTT's) must be identified as part of this notification. Identify CSTT's by completing Sections III and IV of CHI Form LDR-1 Addendum and attach completed Addendum to this form.

5 = The waste is a characteristic waste D003 Reactive Sulfide, Reactive Cyanide, or Unexploded Ordnance subcategory, a characteristic waste D004-11, a characteristic waste D012-17 wastewater, or a listed (i.e., F-, K-, U-, or P-code) hazardous waste. UHC's are NOT required to be identified.

6 = The waste is a lab pack that is intended for incineration using the alternative lab pack treatment standard under 40 CFR 268.42(c). UHC's are NOT required to be identified; however, the generator must complete and attach the lab pack certification statement on CHI Form LDR-LP. Note that in accordance with 40 CFR Part 268 Appendix IV, lab packs which contain waste codes D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P076, P078, U134, and U151 are not eligible for alternative lab pack treatment standard.

SECTION I. CHARACTERISTIC WASTES D001 THROUGH D043

COLUMN 1: LINE ITEM SEE MANIFEST		COLUMN 2: WASTE CODE / SUBCATEGORY		COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
	[ ]	D001	Ignitables, except High TOC subcategory	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ]	D001	High TOC Ignitable Liquids Subcategory (Greater than or equal to 10% TOC)	[ ] Non-WW only	1A 3 6
11a, 11d	[X]	D002	Corrosives	[ ] WW [X] Non-WW	11a (1) (2) 11d 3 4 6
	[ ]	D003			
	[ ]		Reactive Sulfide, per 261.23(a)(5)	[ ] WW [ ] Non-WW	1 3 4 5 6
	[ ]		Reactive Cyanide, per 261.23(a)(5)	[ ] WW [ ] Non-WW	1 3 4 5 6
	[ ]		Explosive, per 261.23(a)(6), (7) & (8)	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ]		Water Reactive, per 261.23(a)(2), (3) & (4)	[ ] Non-WW only	1 2 3 4 6
	[ ]		Other Reactive, per 261.23(a)(1)	[ ] WW [ ] Non-WW	1 2 3 4 6
	[ ]		Unexploded Ordnance, Emergency Response	[ ] WW [ ] Non-WW	1 3 4 5 6
11a	[X]	D004	Arsenic	[ ] WW [X] Non-WW	3 4 (5) 6
11c	[X]	D005	Barium	[ ] WW [X] Non-WW	3 4 (5) 6
11c	[X]	D006			
	[X]		Cadmium	[ ] WW [X] Non-WW	3 4 (5) 6
	[ ]		Cadmium Containing Batteries	[ ] Non-WW only	3 5 6
11a, 11b, 11d	[X]	D007	Chromium	[ ] WW [X] Non-WW	3 4 (5) 6
	[ ]	D008			
	[ ]		Lead	[ ] WW [ ] Non-WW	3 4 5 6
	[ ]		Lead Acid Batteries	[ ] Non-WW only	3 5 6

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 Manifest No. _____

SECTION I. CHARACTERISTIC WASTES D001-43 (CONTINUED)

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / NAME	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
_____	[ ] D009		
	[ ] Low Mercury, less than 260 mg/kg Mercury	[ ] WW [ ] Non-WW	3 4 5
	[ ] High Mercury Organic Subcategory	[ ] Non-WW only	3 4 5
	[ ] High Mercury Inorganic Subcategory	[ ] Non-WW only	3 4 5
_____	[ ] D010 Selenium	[ ] WW [ ] Non-WW	3 4 5 6
_____	[ ] D011 Silver	[ ] WW [ ] Non-WW	3 4 5 6
_____	[ ] D012 Endrin	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D013 Lindane	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D014 Methoxychlor	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D015 Toxaphene	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D016 2,4-D	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D017 2,4,5-TP (Silvex)	[ ] WW [ ] Non-WW	2 3 4 5 6
_____	[ ] D018 Benzene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D019 Carbon tetrachloride	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D020 Chlordane	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D021 Chlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D022 Chloroform	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D023 o-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D024 m-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D025 p-Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D026 Cresol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D027 1,4-Dichlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D028 1,2-Dichloroethane	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D029 1,1-Dichloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D030 2,4-Dinitrotoluene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D031 Heptachlor (and its epoxide)	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D032 Hexachlorobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D033 Hexachlorobutadiene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D034 Hexachloroethane	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D035 Methyl ethyl ketone	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D036 Nitrobenzene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D037 Pentachlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D038 Pyridine	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D039 Tetrachloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D040 Trichloroethylene	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D041 2,4,5-Trichlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D042 2,4,6-Trichlorophenol	[ ] WW [ ] Non-WW	1 2 3 4 6
_____	[ ] D043 Vinyl Chloride	[ ] WW [ ] Non-WW	1 2 3 4 6

SECTION II. SPENT SOLVENT WASTES F001 THROUGH F005

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / CONSTITUENTS	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
_____	[ ] F001 [ ] F002 [ ] F003 [ ] F004 [ ] F005	[ ] WW [ ] Non-WW	3 4 5 6

_____ [ ] 1. ALL F001-F005
_____ [ ] 2. Acetone
_____ [ ] 3. Benzene
_____ [ ] 4. n-Butyl alcohol
_____ [ ] 5. Carbon disulfide
_____ [ ] 6. Carbon tetrachloride
_____ [ ] 7. Chlorobenzene
_____ [ ] 8. o-Cresol
_____ [ ] 9. m-Cresol (difficult to distinguish from p-cresol)
_____ [ ] 10. p-Cresol (difficult to distinguish from m-cresol)
_____ [ ] 11. Cresol - mixed isomers (sum of o-, m- and p-cresol)
_____ [ ] 12. Cyclohexanone
_____ [ ] 13. o-Dichlorobenzene
_____ [ ] 14. 2-Ethoxyethanol (F005 only)
_____ [ ] 15. Ethyl acetate
_____ [ ] 16. Ethyl benzene
_____ [ ] 17. Ethyl ether
_____ [ ] 18. Isobutyl alcohol
_____ [ ] 19. Methanol
_____ [ ] 20. Methylene chloride
_____ [ ] 21. Methyl ethyl ketone
_____ [ ] 22. Methyl isobutyl ketone
_____ [ ] 23. Nitrobenzene
_____ [ ] 24. 2-Nitropropane (F005 only)
_____ [ ] 25. Pyridine
_____ [ ] 26. Tetrachloroethylene
_____ [ ] 27. Toluene
_____ [ ] 28. 1,1,1-Trichloroethane
_____ [ ] 29. 1,1,2-Trichloroethane
_____ [ ] 30. Trichloroethylene
_____ [ ] 31. 1,1,2-Trichloro-1,2,2-trifluoroethane
_____ [ ] 32. Trichloromonofluoromethane
_____ [ ] 33. Xylene - mixed isomers (sum of o-, m-, and p-xylene)

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 Manifest No. _____

SECTION III. CALIFORNIA LIST WASTES

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / SUBCATEGORY	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
_____	Hazardous waste containing one or more of the following California List constituents:	[ ] WW [ ] Non-WW	1 2 3 4 5 6

[ ] ALL CALIFORNIA LIST CONSTITUENTS
[ ] Liquids with nickel greater than or equal to 134 mg/l
[ ] Liquids with thallium greater than or equal to 130 mg/l
[ ] Liquids with PCB's > or = 50 ppm
[ ] Waste containing HOC's > or = 1,000 mg/kg

SECTION IV. OTHER LISTED WASTES (F006-12, F019-F028, F037-38, F039, K-, U-, AND P-CODES)

COLUMN 1: LINE ITEM SEE MANIFEST	COLUMN 2: WASTE CODE / SUBCATEGORY	COLUMN 3: WASTEWATER/ NON-WASTEWATER	COLUMN 4: HANDLING CODE
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6
_____	_____	[ ] WW [ ] Non-WW	3 4 5 6

[ ] CHECK HERE IF ADDITIONAL LISTED WASTE CODES ARE PRESENT. COMPLETE AND ATTACH LDR-1 CONTINUATION SHEET.
[ ] CHECK HERE IF WASTE CODE F039 (MULTISOURCE LEACHATE) IS PRESENT. IDENTIFY F039 CONSTITUENTS BY COMPLETING SECTIONS II AND IV OF CHI FORM LDR-1 ADDENDUM AND ATTACH COMPLETED ADDENDUM TO THIS FORM.

SECTION V. CONTACT NAME AND DATE

Print Name: GROVER THOMAS Date: 06-10-98

KEY TERMS/DEFINITIONS

CLASS I SDWA SYSTEM means a Class I deep well facility regulated under the Safe Drinking Water Act (SDWA).

CWA SYSTEM means a centralized wastewater treatment facility discharging under a Clean Water Act (CWA) permit. For example, a CWA facility would treat organic or inorganic aqueous wastes and discharge the treated effluent to the local sewer system. Examples of CWA treatment systems owned and operated by Clean Harbors include the wastewater treatment operations at Baltimore (including the CES system), Bristol, Chicago, Cincinnati and Cleveland.

CWA-EQUIVALENT SYSTEM means a "zero discharge system" that engages in "CWA-equivalent" treatment before land disposal. Zero-discharge facilities treat hazardous wastes using "CWA-equivalent" treatment methods, but do not discharge the treatment effluent to a sewer or water body (e.g., spray irrigation land farm). "CWA-equivalent" treatment methods means biological treatment for organics, alkaline chlorination, or ferrous sulfate precipitation for cyanide, precipitation/ sedimentation for metals, reduction of hexavalent chromium, or other treatment technology that can be demonstrated to perform equally or greater than these technologies.

HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY means an ignitable liquid hazardous waste (waste code D001) which contains greater than or equal to 10% total organic carbon (TOC). Pursuant to 40 CFR 268.40, such wastes must be treated using organic recovery (RORGS) or combustion (CMBST) technology. Examples of RORGS technologies include the CES unit at Clean Harbors of Baltimore. Examples of CMBST technologies include hazardous waste fuel blending and subsequent reuse at a cement kiln, or destruction at a RCRA incinerator.

WASTEWATERS are wastes that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS). [See 40 CFR 268.2(f)]

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.
LAND DISPOSAL RESTRICTION NOTIFICATION FORM LDR-1 ADDENDUM Manifest No. _____

SECTION I. UNDERLYING HAZARDOUS CONSTITUENTS (UHC'S)

[ ] Check here if one or more of the constituents listed in Section IV below are reasonably expected to be present as an "Underlying Hazardous Constituent" in the waste. Then in Section IV, check off each constituent. Note that per the definition of UHC in 40 CFR 268.2, vanadium and zinc are NOT regulated as UHC's.

[X] Check here if NONE of the UHC constituents listed in Section IV are expected to be present in the waste.

SECTION II. MULTI-SOURCE LEACHATE (WASTE CODE F039)

[ ] Check here if one or more of the constituents listed in Section IV are present as a constituent in the multi-source leachate (F039) waste. Then in Section IV below, check off each constituent. Note that constituents which are identified by an asterisk (*) are NOT regulated as F039 constituents.

[ ] Check here if NONE of the F039 constituents listed in Section IV are present in the waste.

SECTION III. HAZARDOUS DEBRIS CONTAMINANTS SUBJECT TO TREATMENT (CSTT)

[ ] Check here if one or more of the constituents listed in Section IV is a CSTT for hazardous debris that is intended for treatment using the alternate treatment technologies in 40 CFR 268.45. To identify CSTT's, refer to the "Regulated Hazardous Constituent" column in the Treatment Standard Table in 40 CFR 268.40. Then, in Section IV below, check off the constituents that appear for each waste code used to identify the debris.

[ ] Check here if the entry in the "Regulated Hazardous Constituent" column in the Treatment Standard Table in 40 CFR 268.40 is "Not Applicable" , i.e. D001, D002, and D003 (non-cyanides subcategories only).

SECTION IV. LIST OF CONSTITUENTS - INCLUDE MANIFEST LINE ITEM

250.	[ ]	A2213 (*)	72.	[ ]	Chlordane (alpha and gamma isomers)
34.	[ ]	Acenaphthylene	73.	[ ]	p-Chloroaniline
35.	[ ]	Acenaphthene	74.	[ ]	Chlorobenzene
36.	[ ]	Acetone	75.	[ ]	Chlorobenzilate
37.	[ ]	Acetonitrile	76.	[ ]	2-Chloro-1,3-butadiene
38.	[ ]	Acetophenone	77.	[ ]	Chlorodibromomethane
39.	[ ]	2-Acetylaminofluorene	78.	[ ]	Chloroethane
40.	[ ]	Acrolein	79.	[ ]	bis(2-Chloroethoxy)methane
41.	[ ]	Acrylamide (*)	80.	[ ]	bis(2-Chloroethyl)ether
42.	[ ]	Acrylonitrile	81.	[ ]	Chloroform
251.	[ ]	Aldicarb sulfone (*)	82.	[ ]	bis(2-Chloroisopropyl)ether
43.	[ ]	Aldrin	83.	[ ]	p-Chloro-m-cresol
44.	[ ]	4-Aminobiphenyl	84.	[ ]	2-Chloroethyl vinyl ether (*)
45.	[ ]	Aniline	85.	[ ]	Chloromethane (Methyl Chloride)
46.	[ ]	Anthracene	86.	[ ]	2-Chloronaphthalene
47.	[ ]	Antimony	87.	[ ]	2-Chlorophenol
48.	[ ]	Aramite	88.	[ ]	3-Chloropropylene
49.	[ ]	Arsenic	89.	[ ]	Chromium (Total)
50.	[ ]	alpha-BHC	90.	[ ]	Chrysene
51.	[ ]	beta-BHC	91.	[ ]	o-Cresol
52.	[ ]	delta-BHC	92.	[ ]	m-Cresol (difficult to distinguish from p-Cresol)
53.	[ ]	gamma-BHC	93.	[ ]	p-Cresol (difficult to distinguish from o-Cresol)
252.	[ ]	Barban (*)	262.	[ ]	m-Cumenyl methylcarbamate (*)
54.	[ ]	Barium	94.	[ ]	Cyanides (Total)
253.	[ ]	Bendiocarb (*)	95.	[ ]	Cyanides (Amenable)
254.	[ ]	Bendiocarb phenol (*)	263.	[ ]	Cycloate (*)
255.	[ ]	Benomyl (*)	96.	[ ]	Cyclohexanone
55.	[ ]	Benzene	97.	[ ]	1,2-Dibromo-3-chloropropane
56.	[ ]	Benz(a)anthracene	98.	[ ]	1,2-Dibromoethane (Ethylene dibromide)
57.	[ ]	Benzal chloride (*)	99.	[ ]	Dibromomethane
58.	[ ]	Benzo(b)fluoranthene (difficult to distinguish from Benzo(k)fluoranthene)	100.	[ ]	2,4-Dichlorophenoxyacetic acid (2,4-D)
59.	[ ]	Benzo(k)fluoranthene (difficult to distinguish from Benzo(b)fluoranthene)	101.	[ ]	o,p'-DDD
60.	[ ]	Benzo(g,h,i)perylene	102.	[ ]	p,p'-DDD
61.	[ ]	Benzo(a)pyrene	103.	[ ]	o,p'-DDE
62.	[ ]	Beryllium	104.	[ ]	p,p'-DDE
63.	[ ]	Bromodichloromethane	105.	[ ]	o,p'-DDT
64.	[ ]	Bromomethane (Methyl bromide)	106.	[ ]	p,p'-DDT
65.	[ ]	4-Bromophenyl phenyl ether	107.	[ ]	Dibenz(a,h)anthracene
66.	[ ]	n-Butyl alcohol	108.	[ ]	Dibenzo(a,e)pyrene
256.	[ ]	Butylate (*)	109.	[ ]	m-Dichlorobenzene
67.	[ ]	Butyl benzyl phthalate	110.	[ ]	o-Dichlorobenzene
68.	[ ]	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	111.	[ ]	p-Dichlorobenzene
69.	[ ]	Cadmium	112.	[ ]	Dichlorodifluoromethane
257.	[ ]	Carbaryl (*)	113.	[ ]	1,1-Dichloroethane
258.	[ ]	Carbendazim (*)	114.	[ ]	1,2-Dichloroethane
259.	[ ]	Carbofuran (*)	115.	[ ]	1,1-Dichloroethylene
260.	[ ]	Carbofuran phenol (*)	116.	[ ]	trans-1,2-Dichloroethylene
70.	[ ]	Carbon disulfide	117.	[ ]	2,4-Dichlorophenol
71.	[ ]	Carbon tetrachloride	118.	[ ]	2,6-Dichlorophenol
261.	[ ]	Carbosulfan (*)	119.	[ ]	1,2-Dichloropropane
			120.	[ ]	cis-1,3-Dichloropropylene
			121.	[ ]	trans-1,3-Dichloropropylene

122. _____ [ ] Dieldrin
123. _____ [ ] Diethyl phthalate
264. _____ [ ] Diethylene glycol, dicarbamate (*)
124. _____ [ ] 2,4-Dimethyl phenol
125. _____ [ ] Dimethyl phthalate
126. _____ [ ] Di-n-butyl phthalate
127. _____ [ ] 1,4-Dinitrobenzene
128. _____ [ ] 4,6-Dinitro-o-cresol
129. _____ [ ] 2,4-Dinitrophenol
130. _____ [ ] 2,4-Dinitrotoluene
131. _____ [ ] 2,6-Dinitrotoluene
132. _____ [ ] Di-n-octyl phthalate
265. _____ [ ] Dimetilan (*)
133. _____ [ ] p-Dimethylaminoazobenzene (*)
134. _____ [ ] Di-n-propylnitrosoamine
135. _____ [ ] 1,4-Dioxane (*)
136. _____ [ ] Diphenylamine (difficult to distinguish from diphenylnitrosamine)
137. _____ [ ] Diphenylnitrosamine (difficult to distinguish from diphenylamine)
138. _____ [ ] 1,2-Diphenylhydrazine
139. _____ [ ] Disulfoton
266. _____ [ ] Dithiocarbamates (Total) (*)
140. _____ [ ] Endosulfan I
141. _____ [ ] Endosulfan II
142. _____ [ ] Endosulfan sulfate
143. _____ [ ] Endrin
144. _____ [ ] Endrin aldehyde
267. _____ [ ] EPTC (*)
145. _____ [ ] Ethyl acetate
146. _____ [ ] Ethyl cyanide (propanenitrile)
147. _____ [ ] Ethyl benzene
148. _____ [ ] Ethyl ether
149. _____ [ ] bis(2-Ethylhexyl)phthalate
150. _____ [ ] Ethyl methacrylate
151. _____ [ ] Ethylene oxide
152. _____ [ ] Famphur
153. _____ [ ] Fluoranthene
154. _____ [ ] Fluorene
155. _____ [ ] Fluoride
268. _____ [ ] Formetanate hydrochloride (*)
269. _____ [ ] Formparanate (*)
156. _____ [ ] Heptachlor
157. _____ [ ] Heptachlor epoxide
158. _____ [ ] Hexachlorobenzene
159. _____ [ ] Hexachlorobutadiene
160. _____ [ ] Hexachlorocyclopentadiene
161. _____ [ ] HxCDDs (All hexachlorodibenzo-p-dioxins)
162. _____ [ ] HxCDFs (All hexachlorodibenzofurans)
163. _____ [ ] Hexachloroethane
164. _____ [ ] Hexachloropropylene
165. _____ [ ] Indeno (1,2,3-c,d)pyrene
270. _____ [ ] 3-Iodo-2-propynyl n-butylcarbamate (*)
166. _____ [ ] Iodomethane
167. _____ [ ] Isobutyl alcohol
168. _____ [ ] Isodrin
271. _____ [ ] Isolan (*)
169. _____ [ ] Isosafrole
170. _____ [ ] Kepone
171. _____ [ ] Lead
172. _____ [ ] Mercury--Nonwastewater from Retort
173. _____ [ ] Mercury--All others
174. _____ [ ] Methacrylonitrile
175. _____ [ ] Methanol
176. _____ [ ] Methapyrilene
272. _____ [ ] Methiocarb (*)
273. _____ [ ] Methomyl (*)
177. _____ [ ] Methoxychlor
178. _____ [ ] 3-Methylcholanthrene
179. _____ [ ] 4,4-Methylene-bis(2-chloroaniline)
180. _____ [ ] Methylene chloride

181. _____ [ ] Methyl ethyl ketone
182. _____ [ ] Methyl isobutyl ketone
183. _____ [ ] Methyl methacrylate
184. _____ [ ] Methyl methansulfonate
185. _____ [ ] Methyl parathion
274. _____ [ ] Metolcarb (*)
275. _____ [ ] Mexacarbate (*)
276. _____ [ ] Molinate (*)
186. _____ [ ] Naphthalene
187. _____ [ ] 2-Naphthylamine
188. _____ [ ] Nickel
189. _____ [ ] o-Nitroaniline (*)
190. _____ [ ] p-Nitroaniline
191. _____ [ ] Nitrobenzene
192. _____ [ ] 5-Nitro-o-toluidine
193. _____ [ ] o-Nitrophenol (*)
194. _____ [ ] p-Nitrophenol
195. _____ [ ] N-Nitrosodiethylamine
196. _____ [ ] N-Nitrosodimethylamine
197. _____ [ ] N-Nitroso-di-n-butylamine
198. _____ [ ] N-Nitrosomethylethylamine
199. _____ [ ] N-Nitrosomorpholine
200. _____ [ ] N-Nitrosopiperidine
201. _____ [ ] N-Nitrosopyrrolidine
277. _____ [ ] Oxamyl (*)
202. _____ [ ] Parathion
203. _____ [ ] Total PCBs (sum of all PCB isomers, or all Arochlors)
278. _____ [ ] Pebulate (*)
204. _____ [ ] Pentachlorobenzene
205. _____ [ ] PeCDDs (All pentachlorodibenzo-p-dioxins)
206. _____ [ ] PeCDFs (All pentachlorodibenzofurans)
207. _____ [ ] Pentachloroethane (*)
208. _____ [ ] Pentachloronitrobenzene
209. _____ [ ] Pentachlorophenol
210. _____ [ ] Phenacetin
211. _____ [ ] Phenanthrene
212. _____ [ ] Phenol
279. _____ [ ] o-Phenylenediamine (*)
213. _____ [ ] Phorate
214. _____ [ ] Phthalic acid (*)
215. _____ [ ] Phthalic anhydride
280. _____ [ ] Physostigmine (*)
281. _____ [ ] Physostigmine salicylate (*)
282. _____ [ ] Promecarb (*)
216. _____ [ ] Pronamide
283. _____ [ ] Propham (*)
284. _____ [ ] Propoxur (*)
285. _____ [ ] Prosulfocarb (*)
217. _____ [ ] Pyrene
218. _____ [ ] Pyridine
219. _____ [ ] Safrole
220. _____ [ ] Selenium
221. _____ [ ] Silver
222. _____ [ ] Silvex (2,4,5-TP)
223. _____ [ ] Sulfide
224. _____ [ ] 2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
225. _____ [ ] 1,2,4,5-Tetrachlorobenzene
226. _____ [ ] TCDDs (All tetrachlorodibenzo-p-dioxins)
227. _____ [ ] TCDFs (All tetrachlorodibenzofurans)
228. _____ [ ] 1,1,1,2-Tetrachloroethane
229. _____ [ ] 1,1,2,2-Tetrachloroethane
230. _____ [ ] Tetrachloroethylene
231. _____ [ ] 2,3,4,6-Tetrachlorophenol
232. _____ [ ] Thallium
286. _____ [ ] Thiodicarb (*)
287. _____ [ ] Thiophanate-methyl (*)
288. _____ [ ] Tirpate (*)
233. _____ [ ] Toluene
234. _____ [ ] Toxaphene
289. _____ [ ] Triallate (*)
235. _____ [ ] Tribromomethane (Bromoform)

236. _____ [ ] 1,2,4-Trichlorobenzene
237. _____ [ ] 1,1,1-Trichloroethane
238. _____ [ ] 1,1,2-Trichloroethane
239. _____ [ ] Trichloroethylene
240. _____ [ ] Trichloromonofluoromethane
241. _____ [ ] 2,4,5-Trichlorophenol
242. _____ [ ] 2,4,6-Trichlorophenol
243. _____ [ ] 1,2,3-Trichloropropane
244. _____ [ ] 1,1,2-Trichloro-1,2,2-trifluoroethane
290. _____ [ ] Triethylamine (*)
245. _____ [ ] tris-(2,3-Dibromopropyl)phosphate
246. _____ [ ] Vanadium (*)
291. _____ [ ] Vernolate (*)
247. _____ [ ] Vinyl chloride
248. _____ [ ] Xylenes--mixed isomers (sum of o-, m-, and p-xylene concentrations)
249. _____ [ ] Zinc (*)

KEY TERMS/DEFINITIONS

CONTAMINANTS SUBJECT TO TREATMENT (CSTT) are the specific constituents listed by waste code number in the Treatment Standard Table in §268.40. CSTT's must be identified for all hazardous debris wastes that are intended for treatment using one of the hazardous debris alternate treatment technologies described in §268.45.

REASONABLY EXPECTED TO BE PRESENT means that the generator is relying on knowledge of the raw materials used, the process, and potential reaction products, or on the results of a one-time analysis for the entire list of UHC's that may be present in the untreated hazardous waste. If a one-time analysis of the entire list of UHC's is conducted, subsequent analyses are required for only those pollutants which would reasonably be expected to be present in the waste as generated, based on the previous sampling and analysis results.

UNDERLYING HAZARDOUS CONSTITUENT (UHC) means any constituent listed in §268.48 Table UTS - Universal Treatment Standards (except vanadium and zinc) which can reasonably be expected to be present at the point of generation of the hazardous waste, at a concentration above the constituent-specific UTS treatment standard. [See 40 CFR 268.2]

Callender-MIT
SA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: DEC 07 1994

SUBJECT: Ohio TC Inspection Review

FROM: Sheila Burrus S.B.
Environmental Protection Specialist

TO: File

11/9/91

I have reviewed the attached report and concur with the State's determination to return this facility to compliance.

OhioEPA
State of Ohio Environmental Protection Agency
Central District Office

Street Address:
2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:
P.O. Box 2198
Columbus, Ohio 43266-2198

George V. Voinovich
Governor

Donald R. Schregardus
Director

RCRIS
INSP
TCLP

December 13, 1991

RE: FRANKLIN COUNTY Border Inc Columbus
~~COLUMBUS COATED FABRICS~~ Coated F
OHD004294351/01-25-0145
G - TSDF
SOE

Mr. Grover B. Thomas, Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Thomas:

On November 19, 1991 and November 20, 1991 the Ohio EPA, Central District Office inspected Columbus Coated Fabrics (CCF) to determine compliance with Ohio EPA and U.S. EPA hazardous waste regulations. CCF was inspected for compliance with the Ohio Administrative Code (OAC) Rules 3745-65 through 3745-66 and Part 265 of Title 40 Code of Federal Regulations pertaining to the generation and storage of hazardous waste. CCF was found to be in compliance, at the time of the inspection, with the hazardous waste regulations noted above.

It should be noted that CCF was not evaluated for compliance with the financial assurance requirements. Central Office staff at the Ohio EPA are responsible for this review.

During the inspection, CCF was also evaluated for compliance with the Land Disposal Restriction (LDR) regulations. CCF was found to be in compliance with the LDR regulations.

CCF was evaluated for compliance with the Federal Toxicity Characteristic (TC) rule requirement found in 40 CFR 262.11 and is in compliance with this rule. CCF was also evaluated for compliance with additional Federal operational and recordkeeping requirements related to the management of TC wastes, and is in compliance. The TC rule related information obtained during the inspection will be forwarded by Ohio EPA to U.S. EPA for review.

In compliance

On November 21, 1991 and November 22, 1991, Ohio EPA, Division of Hazardous Waste Management, Central District Office conducted an inspection at CCF to determine compliance with the conditions of the final Resource Conservation and Recovery Act Permit which was issued by U.S. EPA on September 27, 1984. This inspection was conducted in the presence of Grover B. Thomas, CCF Environmental Manager, and John Sykes, CCF Environmental Coordinator. The results of the Part B inspection are being forwarded by Ohio EPA to U.S. EPA for review and follow up.

If you have any questions regarding the content of this letter, please call me at (614) 771-7505. The time you spent meeting with me during the inspections is appreciated.

Sincerely,

Andrew D. Kubalak

Andrew D. Kubalak
Division of Hazardous Waste Management
Central District Office

ADK/sc

cc: Carolyn Reierson, DHWM, CO
Laurie Stevenson, DHWM, CO
Jeff Mayhugh, DHWM, CO

3LH/17-18

To - Compliance file

BORDEN PACKAGING and INDUSTRIAL PRODUCTS
DOMESTIC AND INTERNATIONAL
DIVISION OF BORDEN, INC.

ENVIRONMENTAL PROTECTION AGENCY REGION V

'93 FEB 16 P3:57

OFFICE OF THE REGIONAL ADMINISTRATOR

February 10, 1993

TO: WMD
CC: RA RF (LO)
O'RIORDAN (LO)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED MAR 15 1993
WMD RCRA
RECORD CENTER Compliance

Mr. Donald R. Schregardus, Director
Ohio EPA
1800 Water Mark Drive, Box 1049
Columbus, OH 43266-0149
ATTEN: Mr. Thomas Crepeau, Manager
Data Management for DSHWM

Mr. Valdas AdamKus, Regional Administrator
U.S. EPA, Region 5 HRP-8
77 West Jackson Blvd.
Chicago, IL 60604
ATTEN: Harriet Croke, Chief of Ohio Permitting
Section, RCRA Permitting Branch

Re: Ohio EPA's Andrew Kubalak's letter of 12/08/92
Hazardous Waste Container Storage Area Closure
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201
Latitude: 39 degrees 59 minutes 33 seconds
Longitude: 82 degrees 59 minutes 43 seconds
U.S. EPA ID# OHD 004 294 351
Ohio EPA ID# 01-25-0145

RECEIVED
FEB 18 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Crepeau and Ms. Croke:

As requested by Ohio EPA's Andrew Kubalak in his letter of December 8, 1992, Columbus Coated Fabrics (CCF) has completed a review of CCF's hazardous waste manifests and operating records. The review supports CCF's claim that Warfarin has never been generated on site and was never stored on the drum storage pad.

If you have any questions or require additional information, please contact Grover Thomas at 614/297-6097.

Sincerely,

Grover Thomas

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap

Certifications

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

W. Bailey Barton, Vice President, Borden Inc.

February 10, 1993
Date

cc: Andrew Kubalak, Ohio EPA

Brent Kinnan, Borden, Inc. - Law Dept.
Rick Springer, Borden, Inc. - Health & Environment
John Sykes, Borden, Inc. - Columbus Coated Fabrics
Grover Thomas, Borden, Inc. - Columbus Coated Fabrics
Ann Tyler, Borden, Inc. - Health & Environment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

HSE-5J/ESS-SPCC
W32201

JUN 10 1992

Mr. Grover Thomas
Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Thomas:

This will acknowledge receipt of your Spill Prevention, Control and Counter-measure (SPCC) Plan, certified by C. Richard Springer, P.E. Your facility now appears to be in compliance with the Code of Federal Regulations, Title 40, Part 112.

We would like to take this opportunity to remind you that the regulations require the SPCC Plan be reviewed and updated every three (3) years and that, if a spill should occur, the Clean Water Act, Section 311(b)(5) requires that it be reported to the Federal Government.

We have enclosed a poster, for your convenience, which identifies State, regional and national emergency phone numbers. These numbers may be used on a 24-hour, 7-day-per-week basis to report spills. A call to the National Response Center (800-424-8802) satisfies the Federal notification requirement. Please feel free to reproduce this poster as often as you wish.

Should you have any questions about the SPCC Program, please feel free to contact either Ms. Isalee Coleman of my staff at (312) 886-7597, or myself at (312) 353-8200.

Sincerely,

Maureen O'Mara, Acting Chief
Emergency Support Section

Enclosure

cc: Ohio Environmental Protection Agency

bcc: yellow (case file)
blue (SPCC read)
blue (EERB read)

IColeman/HSE-5J/ESS-SPCC/6-3-92/6-7597/F:Columbus.11
Revised Form 11 - Acknowledgement Letter - Company now in compliance

CONCURRENCES

SYMBOL	ESS	ESS					
SURNAME	Coleman	O'Mara					
DATE	6-3-92	6/3/92					

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

BORDEN PACKAGING and INDUSTRIAL PRODUCTS
DOMESTIC AND INTERNATIONAL
DIVISION OF BORDEN, INC.

May 29, 1992

Pamela J. Schafer, HS-5J/ESS-SPCC, W23201
Chief Emergency Support Section
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: SPCC/RCRA Contingency Plan

Dear Ms. Schafer:

In compliance with Section 112.3(d) of the Code of Federal Regulations, the Columbus Coated Fabrics SPCC/RCRA Contingency Plan has been certified by a Registered Professional Engineer and is being resubmitted to your office as requested.

If you have any questions, please call me at 614/297-6097.

Very truly yours,

Grover Thomas

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap

cc: Isalee Coleman, HS-5J/ESS-SPCC, W23201
Emergency Support Section
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 30 1992

HSE-5J/ESS-SPCC
W23201

Mr. Grover Thomas
Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Thomas:

This will acknowledge receipt of the attached Spill Prevention, Control and Countermeasure (SPCC) Plan. However, our engineer's check indicated additional information is needed in order for your facility to be found in compliance with applicable provisions of the Code of Federal Regulations (CFR), Title 40, Part 112.

Section 112.3(d) of the Code of Federal Regulations requires that an SPCC Plan must be certified by a Registered Professional Engineer in order to be valid. A copy of the Regulations is enclosed.

It should be noted that the Oil Pollution Act of 1990 increased the penalties for noncompliance with the SPCC regulations from $5,000 for each offense to $10,000/not to exceed $25,000 for Class I violations and $10,000/not to exceed $125,000 for Class II violations.

Please have your Plan certified by a Registered Professional Engineer, showing the individual's certification number and State, or raised seal, and resubmit the Plan to this office by June 1, 1992, or additional enforcement action may be taken.

If you have any questions, please do not hesitate to contact Isalee Coleman of my staff at (312) 886-7597.

Sincerely,

Pamela J. Schafer, Chief
Emergency Support Section

Enclosure

bcc: yellow (case file)
blue (EERB read)
blue (SPCC read)

IColeman/HSE-5J/6-7597/f:Columbus/f3
~~Modified F3 - Plan not certified~~

CONCURRENCES

SYMBOL	ESS	ESS					
SURNAME	Coleman						
DATE	4-24-92	4/27/92					

OFFICIAL FILE COPY

EPA Form 1320-1 (12-70)

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handing procedures:

Site Activity: Columbus Coated Fabrics (CCF) manufactures wall coverings and vinyl sheeting

Waste Handling: The numbers for the waste streams listed below coincide with the circled numbers I've placed on the attached TCLP results.

1. D002 and D007 hazardous waste is generated at the chrome plating building when rags are used to wipe muriatic acid off of copper cylinders before they are replated with chrome.

2. D002, D007 and D008 hazardous waste is generated at the chrome plating building when rags are used to wipe chrome off of the copper cylinders.

3. Pans are used to collect drippings from roller presses. D001, D007, D0 F003, F005 and K086 hazardous waste is generated when solvent is used to clean these pans.

4. D001, D007, D008, F003, F005 and K086 hazardous waste is generated from a water based pan wash operation which includes a high pressure water wash and a vacuum filter press.

5. D001, D007, D008, F003, F005 and K086 hazardous waste is generated in the ink mix room and consists of waste ink which cannot be recycled.

6. D006 (filter bag) hazardous waste is generated at the Premix process (blend tank) when all ingredients are mixed, heated, and stabilizers are added and then the mixture is run through filter bags before fluxing in the Banbury mixers.

7. D007 hazardous waste is generated when chrome wears off of roller and copper shows through the chrome, the ink must first be removed from the roller before -2- replating. CCF is currently using Pyrollidone, a new solvent manufactured by Dow.

- FEB 1991

Remarks - General Information

8. Dust stop oil, classified as D006 hazardous waste, is generated at the Banbury mixers which are used for the manufacture of fire wall for automobiles.

9. and 10. F006 hazardous waste generated from the waste water pre-treatment unit in the past has been manifested to Trical in Killiard, Ohio. CCF is currently looking for alternate off site permitted facilities capable of accepting this waste stream

11. D002 and D007 hazardous waste generated from cleaning the copper rollers is manifested off site to Chem-Met, Wyandotte, Michigan.

12. D001, D006, D008, F003, F005 hazardous waste is generated when tubs and drums are cleaned with MEK / MIBK.

FEB 7 1992

HRE-8J

Mr. Grover Thomas
Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Re: Return to Compliance
Docket No. V-W-91-R-4
Columbus Coated Fabrics
~~IND~~ 004 294 351
OHD

Dear Mr. Thomas:

We have received and reviewed all items submitted by your facility pursuant to the requirements of the Consent Agreement and Final Order (CAFO) Docket No. V-W-91-R-4. It appears that your facility is now in compliance with the CAFO. Therefore, we have returned your facility to compliance for those violations cited in our Amended Complaint in the above-referenced case.

If you have any further questions, please contact Jane Neumann of my staff at (312) 886-2871. Thank you for your cooperation in bringing this matter to a successful conclusion.

Sincerely yours,

Uylaine E. McMahan, Chief
IN/MN/OH Enforcement Program Section

cc: Michael Savage, OEPA
Andrew Kubalak, OEPA, CDO

Sheila Kennedy
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

bcc: Uylaine McMahan, REB
HR-J\Jane\Phyllis\6-8093\Compliance.lts\Thomas.comp\February 5, 1992

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
PW 2-5-92	JN 2-6-92	UEM 2/6/92	

ORDER TRACKING BY FACILITY DATE OF THIS RUN: 02/10/92 PAGE: 1

FACILITY: COLUMBUS COATED FABRICS
LOCATION: COLUMBUS, OH
RES. CONTACT PERSON: NEUMANN
ORC ATTORNEY: CAHN
STATE CONTACT PERSON: KUBALAK

DOCKET NUMBER: V-W-91-R-004
ID NO.: OHD004294351
SECTION: EPU#2
SNC: F LDF: F
RTC: T

STATUTORY AUTHORITY: 3008(A)
EFFECTIVE DATE: 12/19/91
ESTIMATED COMPLETION DATE: 01/21/92
JUDICIAL CASE: F
ADMINISTRATIVE CASE: T

REQUIREMENTS OF THIS ORDER	DUE DATE	COMPLIANCE DATE	CONFIRM DATE	AMENDED DATE	RTC DATE
1 . MAINTAIN SAMPLE LOGS AND MONITORING RECORDS. COMMENTS:	01/21/92	01/23/92	01/23/92	/ /	02/07/92
2 . PROVIDE TWICE YEARLY REVIEW OF TRAINING TO EMPLOYEES. COMMENTS:	01/21/92	01/23/92	01/23/92	/ /	02/07/92
3 . UPDATE EMERGENCY COORDINATOR DESIGNATIONS IN CONTINGENCY PLAN. COMMENTS: PERMIT MODIFICATION DUE 12-30-91.	01/21/92	01/22/92	01/22/92	/ /	02/07/92
4 . PAY PENALTY OF $2,000. COMMENTS:	01/21/92	01/08/92	01/08/92	/ /	02/07/92

FEB 12 1992

HRE-8J

Mr. Grover Thomas
Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Re: Compliance Letter
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Thomas:

On November 21 and 22, 1991, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the conditions of the Federal Part B RCRA permit issued to this facility in 1984. Other inspections were conducted by OEPA in conjunction with this inspection to determine compliance with Ohio hazardous waste management rules and with requirements under the land disposal restrictions and the Toxicity Characteristic Rule. The State has notified you of its findings with respect to those portions of the inspection in correspondence dated December 13, 1991. This letter addresses only the Federal Part B permit portion of the inspection.

Although the inspector noted some violations of permit conditions on the checklist, we find that this facility is now in compliance with its permit due to actions it has taken pursuant to the Consent Agreement and Final Order in Docket No. V-W-91-R-4. I have enclosed a copy of the inspection checklist.

There apparently continues to be some confusion as to what RCRA permit the facility is operating under. The only effective RCRA permit for this facility is that which was issued by U.S. EPA on September 27, 1984. There have been some recent permit modifications submitted to U.S. EPA for this permit regarding its closure plan, emergency coordinators and references to Stilson Laboratory. Those then become part of the effective Federal permit when approved by U.S. EPA as called for in 40 CFR Part 270. However, any of new Part B permit applications submitted to OEPA at any time as part of the process of applying for a State RCRA permit do not constitute requests for

modification of the Federal permit. As such, all subsequent inspections of this facility for compliance with its Federal Part B permit will not use those later submitted versions of a Part B application.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Jane Neumann of my staff at (312) 886-2871.

Sincerely yours,

Uylaine E. McMahan, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Michael Savage, OEPA
Andrew Kubalak, OEPA, CDO

bcc: Uylaine McMahan, REB
Steve Bouchard, Ohio Permit Section

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
RN 1-15-92	JN 1-15-92	UEM 2/1/92	

Hold for completion of CAFO requirements. JN Completed 1-22-92 JN
RTC letter out 2-7-92

JAN 30 1992

HRE-8J

Pamela Allen, Manager
Compliance Monitoring & Enforcement Section
Division of Hazardous Waste Management
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43266-0149

Re: Report Under 40 CFR 265.56(j)
BORDEN Columbus Coated Fabrics
OHD ~~IND~~ 004 294 351

Dear Ms. Allen:

We recently received the attached spill report filed by Columbus Coated Fabrics pursuant to 40 CFR 265.56(j). I thought it may be useful to your inspectors the next time they evaluate this facility.

Sincerely yours,

Uylaine E. McMahan, Chief
IN/MN/OH Enforcement Program Section

Enclosure

HR-J\Jane\Phyllis\6-8093\gwalker\pam.a\January 29, 1992

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
JW 1-29-92	JW 1-30-92	UEM 1/30/92	

OhioEPA
State of Ohio Environmental Protection Agency
P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor
Donald R. Schregardus
Director

December 23, 1991

RE: Columbus Coated Fabrics

Uylaine E. McMahan, Chief
Indiana/Ohio/Minnesota Enforcement Programs
RCRA Enforcement Branch
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. McMahan:

On November 21 and 22, 1991, Ohio EPA's Central District Office completed an inspection at Columbus Coated Fabrics. Attached you will find a copy of the Federal Part B permit compliance evaluation for the company.

It is our understanding that U.S. EPA will be reviewing the attached and following up on non-compliance issues related to the company's Federal Part B permit. Please note that PPG Circleville also holds a State Part B Permit and enforcement of non-compliance will need to be coordinated between U.S. EPA and Ohio EPA.

Should you have any questions regarding the attached, please feel free to call Laurie Stevenson of my staff at 614-644-2934 or Andy Kubalak of our Central District Office at 614-771-7505.

Sincerely,

Pamela S. Allen

Pamela S. Allen, Manager
Compliance Monitoring and Enforcement Section
Division of Hazardous Waste Management

Sp.PSA.lcn

Attachment

cc (w/o attachment): Carolyn Reierson, DHWM, CO
Andy Kubalak, DHWM, CDO

cc (w/attachment): Laurie Stevenson, DHWM, CO

SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60603
TELEPHONE 312: 853-7000
TELEX 25-4364
FACSIMILE 312: 853-7036

LOS ANGELES
NEW YORK
WASHINGTON, D.C.
LONDON
SINGAPORE
TOKYO
JOINT OFFICE WITH
ASHURST MORRIS CRISP
TOKYO
ASSOCIATED WITH
HASHIDATE LAW OFFICE

WRITER'S DIRECT NUMBER
(312) 853-2224

December 23, 1991

Jane Neumann, RCRA Enforcement Branch, 5HR-12
Waste Management Division
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, Illinois 60604

Re: Columbus Coated Fabrics

Dear Ms. Neumann:

In compliance with the Consent Agreement and Final Order ("CAFO") entered into by Borden, Inc., Columbus Coated Fabrics ("CCF") and U.S. EPA, Region V, we hereby notify you that CCF has achieved compliance with the following requirements of the CAFO.

First, CCF has provided review of training to its hazardous waste personnel twice during 1991 and has documented such review in its operating record as required by the conditions of its permit.

Second, CCF is maintaining sample logs and records of hazardous waste monitoring information containing information as required by the conditions of its permit. With respect to the requirement that CCF record the "Date [a sample] was sent to Stilson laboratory for analysis," CCF has notified U.S. EPA that it has made a Class I modification to its permit to replace all references to Stilson Laboratories with "an independent laboratory."

Finally, CCF has submitted a modification for its permit within ten days of the effective date of the CAFO, in compliance with 40 C.F.R. § 270.42, to designate a new Emergency Coordinator and alternatives. A copy was sent concurrently to

you. U.S. EPA has been sent a copy of the amended contingency plan reflecting the changes.

Yours truly,

Sheila B. Kennedy (DAA)

Sheila B. Kennedy

cc: Michael Savage

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 20 1991

REPLY TO THE ATTENTION OF:

5CS-TUB-3

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

RE: Borden, Inc., Columbus Coated Fabrics,
Docket No. V-W-91-R-4

Dear Judge Head:

Enclosed please find a file-stamped copy of the Consent Agreement and Final Order, signed by the parties, that was filed today by the United States Environmental Protection Agency in the above-referenced matter.

Very truly yours,

Jeffrey A. Cahn
Assistant Regional Counsel
U.S. Environmental Protection
Agency
5CS-TUB-3
230 S. Dearborn Street
Chicago, Illinois 60604

(FTS/312) 886-6670

Enclosure

cc: Shiela Kennedy
Jane Neumann

CERTIFICATE OF SERVICE

I, Jeffrey A. Cahn, hereby certify that I caused copies of the foregoing Consent Agreement and Final Order to be served via first-class United States mail, postage prepaid, on this 20 day of December, 1991, upon the following:

Judge Daniel M. Head
Office of Administrative Law Judges
United States Environmental
Protection Agency
Mail Code A-110
401 M Street, S.W.
Washington, D.C. 20460

and

Sheila Kennedy
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

I further certify that I caused the original of the foregoing Consent Agreement and Final Order to be filed with the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 77 West Jackson Street, Chicago, Illinois, 60604, on this 20 day of December, 1991.

Jeffrey A. Cahn
Assistant Regional Counsel
U.S. EPA, Region V

COLUMBUS COATED FABRICS
Division of
BORDEN CHEMICAL, BORDEN INC.

December 19, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jane Neuman, RCRA Enforcement Branch, HRE-8J
U.S. EPA, REGION V
77 West Jackson Street
Chicago, IL 60604

Re: SPCC for Columbus Coated Fabrics

Dear Jane:

Enclosed is the December 1991 revision of the Columbus Coated Fabrics' Spill Prevention Control and Countermeasures Plan/RCRA Contingency Plan for the facility at Grant Avenue.

Please contact me at 297-6097 concerning any questions.

Very truly yours,

Grover Thomas

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.

CONVERSATION RECORD

TIME: 3 p.m.

DATE: 12-18-91

TYPE: ☐ VISIT ☒ CONFERENCE ☐ TELEPHONE ☐ INCOMING ☐ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO:
Jeff Cahn	ORC	6-6670

ROUTING

NAME/SYMBOL	INT

SUBJECT: Borden - request for release of inspector's memo of findings/referral memo to facility

SUMMARY:

Borden has renewed its request to Andy Kubalak of OEPA for a copy of his 1990 inspection memo to us which formed the basis of our complaint. I had in the past told Andy not to turn it over as it is a pre-decisional document since it is in the form of a referral memo. I discussed this with Jeff Cahn and he told me we should continue to refuse to turn it over for the reason stated above.

ACTION REQUIRED: Tell Andy Kubalak, OEPA

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Jane Neumann	Jane Neumann	12-18-91

ACTION TAKEN: After I reviewed the original memo & its cover letter I discussed this again with Jeff Cahn & recommended release of memo only. I confer with Laura Lodisio & Paul Pimock & Jeff with his boss—all concurred. Called Kubalak.

SIGNATURE	TITLE	DATE
Jane Neumann	EPS	12-18-91

OhioEPA
State of Ohio Environmental Protection Agency
Central District Office

Street Address:
2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:
P.O. Box 2198
Columbus, Ohio 43266-2198

George V. Voinovich
Governor
Donald R. Schregardus
Director

December 13, 1991

RE: FRANKLIN COUNTY
COLUMBUS COATED FABRICS
OHD004294351/01-25-0145
G - TSDF

Mr. Grover B. Thomas, Environmental Manager
Columbus Coated Fabrics
1280 North Grant Avenue
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Thomas:

On November 19, 1991 and November 20, 1991 the Ohio EPA, Central District Office inspected Columbus Coated Fabrics (CCF) to determine compliance with Ohio EPA and U.S. EPA hazardous waste regulations. CCF was inspected for compliance with the Ohio Administrative Code (OAC) Rules 3745-65 through 3745-66 and Part 265 of Title 40 Code of Federal Regulations pertaining to the generation and storage of hazardous waste. CCF was found to be in compliance, at the time of the inspection, with the hazardous waste regulations noted above.

It should be noted that CCF was not evaluated for compliance with the financial assurance requirements. Central Office staff at the Ohio EPA are responsible for this review.

During the inspection, CCF was also evaluated for compliance with the Land Disposal Restriction (LDR) regulations. CCF was found to be in compliance with the LDR regulations.

CCF was evaluated for compliance with the Federal Toxicity Characteristic (TC) rule requirement found in 40 CFR 262.11 and is in compliance with this rule. CCF was also evaluated for compliance with additional Federal operational and recordkeeping requirements related to the management of TC wastes, and is in compliance. The TC rule related information obtained during the inspection will be forwarded by Ohio EPA to U.S. EPA for review.

On November 21, 1991 and November 22, 1991, Ohio EPA, Division of Hazardous Waste Management, Central District Office conducted an inspection at CCF to determine compliance with the conditions of the final Resource Conservation and Recovery Act Permit which was issued by U.S. EPA on September 27, 1984. This inspection was conducted in the presence of Grover B. Thomas, CCF Environmental Manager, and John Sykes, CCF Environmental Coordinator. The results of the Part B inspection are being forwarded by Ohio EPA to U.S. EPA for review and follow up.

If you have any questions regarding the content of this letter, please call me at (614) 771-7505. The time you spent meeting with me during the inspections is appreciated.

Sincerely,

Andrew D. Kubalak

Andrew D. Kubalak
Division of Hazardous Waste Management
Central District Office

ADK/sc

cc: Carolyn Reierson, DHWM, CO
Laurie Stevenson, DHWM, CO
Jeff Mayhugh, DHWM, CO

3LH/17-18

OhioEPA
State of Ohio Environmental Protection Agency
Central District Office

Street Address:
2305 Westbrooke Drive, Building C
Columbus, Ohio 43228
614-771-7505 FAX 614-771-7571

Mailing Address:
P.O. Box 2198
Columbus, Ohio 43266-2198

George V. Voinovich
Governor

Donald R. Schregardus
Director

M E M O R A N D U M

TO: Jeff Mayhugh thru Laurie Stevenson, Supervisor, HWBS, DHWM, CO

FROM: Andrew D. Kubalak thru Lundy Adelsberger, DHWM, CDO

SUBJECT: Columbus Coated Fabrics Part B Inspection

DATE: December 13, 1991

- -

On November 21, 1991 and November 22, 1991, we conducted an inspection at Columbus Coated Fabrics (CCF) to determine compliance with the conditions of their final Resource Conservation and Recovery Act Permit which was issued by U.S. EPA on September 27, 1984. This inspection was conducted in the presence of Grover B. Thomas, Environmental Manager and John Sykes, Environmental Coordinator.

The comments listed below represent the permit conditions which were not being met at the time of the inspection and also indicate the changes in the facility operations which were not provided to Region V in the form of permit modifications.

Violations have been numbered in sequence, i.e., 1., 2., 3., 4., 5. etc. Additional numbers, headings and page numbers have been taken directly from the CCF Part B Permit Checklist.

1. CCF was found to be in violation of Permit Standard Condition I.B.1. Permit Actions - Page 2, as follows:

   Columbus Coated Fabrics (CCF) has not requested permit modifications under the requirements of 40 CFR Part 270.42 as necessary. During the Part B Permit inspection, it became evident that CCF should have made and/or requested a permit modification on at least the five occasions listed below:

OCCASION

- Due to turn around time, it was determined that representative waste stream samples would no longer be analyzed by Stilson Laboratories as the permit indicates. Samples are now analyzed at RCP, Inc. or Springfield Environmental. See checklist comment in II.C.1.b.

OCCASION

- The inspection schedule is followed with the following two exceptions: inspections of the solvent still and related equipment are not performed because the equipment is no longer in use; and not on the permit inspection schedule is satellite accumulation, however it is on the facility inspection checklist. See checklist II.E.1.; II.F.5. and III.E.6.

- The form used to record a daily inventory of hazardous waste containers in storage is different from the form in the permit, however it appeared that the required information was being recorded in a log which I've attached to the checklist. See checklist II.E.2.b.

- The CCF employee responsible for providing hazardous waste training is not Norman Orr as indicated by the Permit. He was replaced by Cornell Harkness, then George Rusinkovitch, and the current trainer is Grover Thomas. See checklist II.F.1.

- CCF did not follow 40 CFR 264.112(c) requirements when amending the closure plan found in their Federal Part B Permit. A copy of the amended closure plan was not included initially with CCF's written notification of or request for a permit modification to authorize a change in the approved closure plan (Attachment E - May 23, 1991 letter to Lisa Pierard). A subsequent letter dated June 27, 1991 to Lisa Pierard did include a copy of the amended closure plan (Attachment F).

NOTE: Columbus Coated Fabrics (CCF) indicated during the inspection that the current Federal Part B Permit which CCF recognizes is the Part B Permit Application which was submitted to Ohio EPA and U.S. EPA in November, 1990. When the revised November, 1990 Application was submitted to Ohio, a copy of the Application was also provided to Lisa Pierard, RCRA Activities, U.S. EPA. CCF did not include a cover letter to Lisa indicating that they wanted the November, 1990 Application to be considered a modification to their existing September, 1984 Federal Part B Permit.

Other Part B Permit Applications, submitted to Ohio and U.S. EPA by CCF, occurred on May 30, 1989 to George Hamper, U.S. EPA, Region V, Chicago, Illinois; and on March 8, 1990 to Lisa Pierard. These Applications were submitted to meet Ohio EPA requirements. CCF did not include cover letters with the submissions to Region V indicating that these submissions were to be considered modifications to the September, 1984 Federal Part B Permit.

Copies of the three letters which accompanied the Part B submissions are attached.

2. CCF was found to be in violation of Permit Standard Condition I.D. 10. Duties and Requirements - Page 5 - CCF failed to notify the Regional Administrator during the planning stage and within ten day of the decision to make a physical alteration as it pertains to the solvent still and related equipment.

3. CCF was found to be in violation of Permit Standard II.E.1.a. Inspections - Page 14 - Inspections are conducted according to the inspection schedule, however, inspections of the solvent still and related equipment are not performed. This is because the equipment is no longer in use at CCF.

4. CCF was found to be in violation of Permit General Facility Condition II.E.2.b. Inspection Records - Page 15 - The drum inventory sheet used by CCF is different from the log sheet in the September, 1984 Permit, however, it appears that all of the require data is maintained in the log which is used.

5. CCF was found to be in violation of Permit General Facility Condition II.F.1. Personnel Training - Page 15 - The training program is not directed by Norman Orr. The hazardous waste trainer has changed three times since the Permit was issued in September, 1984. The current hazardous waste trainer is Grover Thomas.

Following a list of attachments A through K which are provided to assist U.S. EPA when reviewing the Part B inspection checklist and memo:

CCF Part B Permit Checklist

List of Attachments

A. Sampling and Analysis Log

B. Hazardous Waste Storage Inventory Log

C. RCRA Contingency Plan Letters of Transmittal

D. RCRA Contingency Plan Letters Of Transmittal Including A Copy T Jane Neuman, U.S. EPA

E. Notice Of Intent To Withdraw The Part B Permit Application To Ohio EPA

F. Notice Of Intent To Cease Operations Which Require A Hazardous Waste Facility Permit, Closure Plan Submitted

G. Request For U.S. EPA To Provide Closure Plan Comments Concurrently

H. Closure Plan Public Notice

I. Letter Of Submittal For Part B Permit Application Required By Ohio EPA, Copy To Region V

J. Letter Of Submittal For Part B Permit Application Required By Ohio EPA, Copy To Region V

K. Letter Of Submittal For Part B Permit Application Required By Ohio EPA, Copy To Region V

ADK/LA/sc

Attachments

IH/27-30

RCRA CONSENT AGREEMENT AND FINAL ORDER SIGN-OFF

PART I BACKGROUND

Facility Name Borden Inc., Columbus Coated Fabrics

Facility RCRA ID Number OHD 004 294 351

Docket Number V-W-91 R-4

REB Assignee Jane Neumann ORC Assignee Jeff Cahn

Summary of Agreement Respondent to pay $2,000 penalty (100% of amount in Compliance Order) and correct deficiencies in records.

PART II CONCURRENCES ON DRAFT CAFO

	Initials	Date	Agree	Disagree
REB Assignee	JN	6-21-91	✓	
Chief, RCRA Enf. Section	GG for UM	6/21/91	✓	
Chief, RCRA Enf. Branch	JMB	6/25/91	✓	
Asst. Regional Counsel	CAHN	6/26/91	✓	
Chief, S.W.E.R. Section	[illegible]	6/27/91	✓	

PART III RETURN TO ORC ASSIGNEE FOR TRANSMITTAL OF DRAFT TO THE FACILITY

PART IV FINAL CAFO APPROVAL

REB Assignee	JN	12-5-91	✓	
Chief, RCRA Enf. Section	GG for UM	12/10/91	✓	
Chief, RCRA Enf. Branch	JMB	12/12/91	✓	
Asst. Regional Counsel	[illegible]	12/17/91	✓	
Chief, S.W.E.R. Section	[illegible]	12/17/91	✓	
Assoc. Dir., Office of RCRA	WEM	12/18/91	✓	
Director, WMD	DBL	12/17/91	✓	

PART V RETURN TO ~~J. SHARP, 5HR-13~~ A. PERRY HRE-8J, FOR MAILING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF: BORDEN, INC., COLUMBUS COATED FABRICS 1280 NORTH GRANT AVENUE COLUMBUS, OHIO 43201 EPA ID NO.: OHD 004 294 351	)	DOCKET NO. V-W-91-R-4 CONSENT AGREEMENT AND FINAL ORDER

PREAMBLE

On March 12, 1991, a Complaint was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act ("RCRA") as amended, 42 U.S.C. Section 6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. An Amended Complaint subsequently was filed. The Complainant is the Associate Division Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency ("U.S. EPA"). The Respondent is Borden, Inc., Columbus Coated Fabrics ("CCF").

STIPULATIONS

The parties, desiring to settle this action, enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation and Compliance Order (Docket No. V-W-91-R-4) as well as the Amended Complaint in this matter.

2. Respondent is a New Jersey corporation whose registered agent in Ohio is Prentice-Hall Corporate System, 380 South Fifth Street, Columbus, Ohio 43215. Respondent owns and operates a facility located at 1280 North Grant Avenue, Columbus Ohio (the "facility").

3. Respondent admits the jurisdictional allegations contained in the Amended Complaint.

4. Respondent neither admits nor denies the specific factual allegations contained in the Amended Complaint other than the admissions made in Respondent's Answer.

5. Respondent explicitly waives its right to a hearing on the allegations contained in the Amended Complaint.

6. Should the Respondent fail to comply with any provision contained in the subsequent Final Order, Respondent waives any objection to U.S. EPA's jurisdiction to enforce the Final Order.

7. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount therein specified.

8. This Consent Agreement and Final Order shall become effective on the date it is signed by the Director, Waste Management Division.

FINAL ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Final Order:

A. Respondent shall, immediately upon the effective date of this Final Order (except as otherwise specified below), cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the conditions of its hazardous waste permit, or as provided in Paragraphs B through E below.

B. Respondent shall, within thirty (30) days of the effective date of this Final Order, maintain sample logs and records of hazardous waste monitoring containing the following information:

1. Sample log:

(a) Type of sample taken;

(b) Method used to obtain sample; and

(c) Date it was sent to Stilson laboratory for analysis.

2. Records of monitoring information:

(a) The dates, exact place, and times of sampling or measurements;

(b) The individuals who performed the sampling or measurements;

(c) The dates analyses were performed;

(d) The individuals who performed the analyses;

(e) The analytical techniques or methods used; and

(f) The results of such analyses.

C. Respondent shall provide twice yearly review of training to its hazardous waste personnel and shall document such review in its operating record as required by the conditions of its permit.

D. Respondent shall, within ten (10) days of the effective date of this Final Order, submit a modification for its permit, according to procedures set forth in 40 CFR 270.42, to designate a new Emergency Coordinator and alternatives. A copy of the submission should be sent concurrently to Jane Neumann in the manner set forth below in Section E. Within twenty (20) days thereafter, Respondent shall provide the U.S. EPA with a copy of an amended contingency plan reflecting these changes.

E. Respondent shall notify U.S. EPA in writing within 5 days after achieving compliance with all of the requirements of this Final Order. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Jane Neumann, RCRA Enforcement Branch, 5HR-12.

F. A copy of these documents and all correspondence with U.S. EPA regarding this Final Order shall also be submitted to Michael Savage, Assistant Chief, Inspections and Enforcement Programs, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, Post Office Box 1049, Columbus, Ohio 43266-0149.

G. Respondent shall pay a civil penalty of TWO THOUSAND DOLLARS ($2,000.00) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number (V-W-91-R-4) shall be printed on said payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

The U.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of Treasury pursuant to 31 U.S.C. Section 3717. A late payment handling charge of $20.00 will be imposed on any late payment, with an additional charge of $10.00 for each subsequent 30-day period over which an unpaid balance remains.

Failure to comply with any requirement of this Final Order may subject Respondent to liability for a penalty of up to TWENTY-FIVE THOUSAND DOLLARS ($25,000.00) for each day of continued non-compliance with the terms of the Final Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

The Final Order constitutes a settlement and final disposition of the Complaint and the Amended Complaint filed in this case and the stipulations herein before recited. Plaintiff covenants not to sue CCF for any further civil liability or penalties for matters covered in the Complaint or the Amended Complaint. This release is intended to apply so long as CCF is in compliance with the terms of the Final Order.

Notwithstanding any other provision of this Final Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. Section 6973, or other statutory autho-

rity should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provision of Ohio Administrative Code; 40 CFR Parts 124 and 270; and this Final Order.

SIGNATORIES

Each undersigned representative of a Party to this Consent Agreement and Final Order consisting of seven pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such party to this document.

Agreed to ~~this~~ 22 day of November, 1991.

By: _____
For Borden, Inc., Columbus Coated Fabrics
Respondent

Title: Vice President - Environmental Affairs

Agreed to this 18th day of December, 1991.

By: _____
William E. Muno
Associate Division Director
Office of RCRA
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above agreed and consented to, it is so ordered this 19th day of December, 1991.

_____
David A. Ullrich, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

IN THE MATTER OF:
BORDEN, INC., COLUMBUS COATED FABRICS
1280 North Grant Avenue
Columbus, Ohio 43201
DOCKET NO. V-W-91-R-4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

SUBJECT: CAFO for Execution for Borden, Inc., Columbus Coated Fabrics

FROM: William E. Muno,
Associate Division Director
Office of RCRA

TO: David A. Ullrich,
Director
Waste Management Division

Attached for your review and signature is a Consent Agreement and Final Order (CAFO), the terms of which require Borden, Inc., Columbus Coated Fabrics to conform to certain permit requirements by keeping records of sampling and analysis and providing employee training twice yearly. The CAFO also requires Borden to modify its permit and submit an amended contingency plan reflecting changes in Emergency Coordinator designations.

Borden is assessed a civil penalty of $2,000, which is $100 less than the full penalty assessed in the Amended Complaint. I recommend that you sign the Order on behalf of Region V. Please return the signed CAFO to Joseph Boyle, Chief of the RCRA Enforcement Branch, for proper distribution of signed copies.

Attachment

AP 12/12/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
12/11/91	JN 12-11-91					12/11/91	12/12/91	12/18/91	

5HR-JCK-\Jane\Phyllis\6-8093\Jane\Borden.memo\December 11, 1991

gw 12-19-91

DEC 20 1991

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Warchall
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Re: Consent Agreement and Final Order
Borden, Inc., Columbus Coated Fabrics
Docket No. V-W-91-R-4

Dear Mr. Warchall:

This letter is to acknowledge receipt of the Consent Agreement and Final Order (CAFO) signed by Borden, Inc., Columbus Coated Fabrics. A fully executed copy of the CAFO is enclosed. Please distribute it to the appropriate parties.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

William E. Muno
Associate Division Director
Office of RCRA
Waste Management Division

Enclosure

cc: Michael Savage, OEPA

bcc: Joseph M. Boyle
Uylaine McMahan

JNEUMANN:WARCHALL:sa:12/6/91:disk branch Anita

OFFICIAL FILE COPY

ap, 12/12/91

CONCURRENCE REQUESTED FROM REB

OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
12/6/91	JN 12-6-91	JnB for UM 12/12/91	JnB 12/12/91

UEM 12/18/91

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, and 3 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

U.S.MAIL

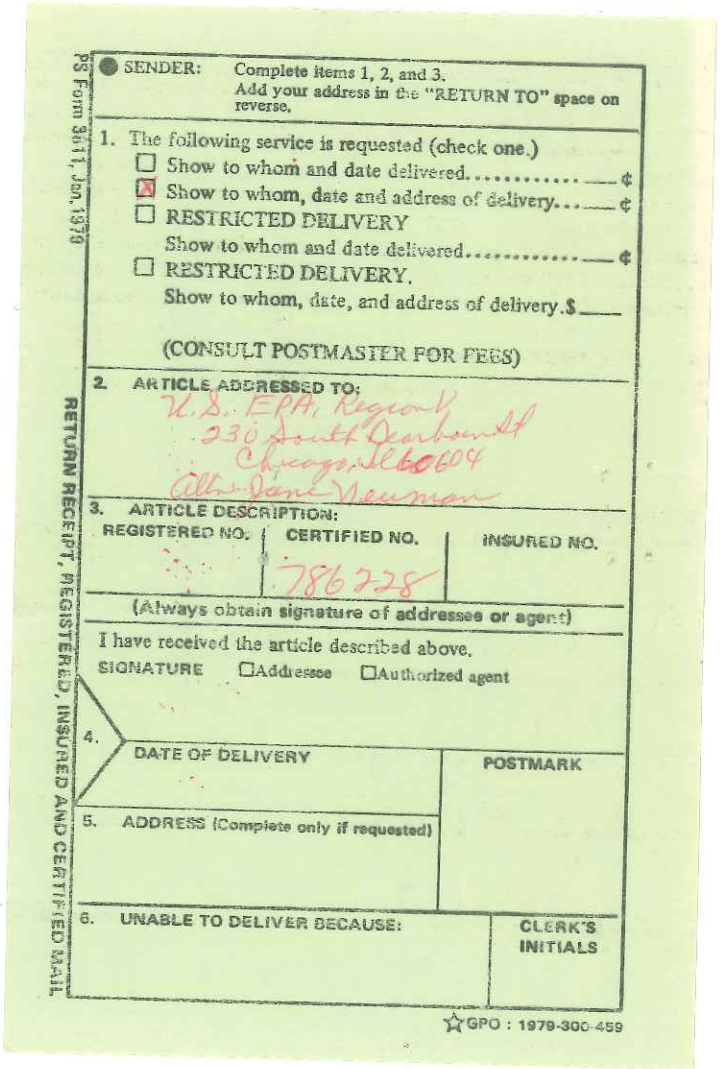
RETURN TO

COLUMBUS COATED FABRICS
DIV. BORDEN CHEMICAL, BORDEN INC.
1280 N. GRANT AVE. P. O. BOX 208
COLUMBUS, OHIO 43216

(Name of Sender)

(Street or P.O. Box)

(City, State, and ZIP Code)



PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered..... ¢
- ☒ Show to whom, date and address of delivery.... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
U.S. EPA, Region V
230 South Dearborn St
Chicago, IL 60604
Attn: Jane Newman

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	786728	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆GPO : 1979-300-459

COLUMBUS COATED FABRICS
Division of
BORDEN CHEMICAL, BORDEN INC.

December 2, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA, REGION V
230 South Dearborn Street
Chicago, IL 60604
ATTENTION: Jane Neuman, RCRA Enforcement Branch, 5HR-12

Re: Columbus Coated Fabrics Spill Prevention & Countermeasures Plan

Dear Jane:

Attached is the updated version of "Section IV - Development of a Discharge Contingency Plan to be followed in event of a Release/Spill" reflecting revised Emergency Coordinators and telephone numbers. Emergency Coordinators were changed due to management changes at Columbus Coated Fabrics.

Please replace pages 29 through 33A dated November, 1991 in your copy of the "Columbus Coated Fabrics Spill Prevention and Countermeasures Plan" with pages 29 through 33A dated December, 1991.

Very truly yours,

Grover Thomas

Grover Thomas,
Environmental Manager
COLUMBUS COATED FABRICS

GT/rap
attach.